

***Field Sampling Plan for
Monitoring Type B Probes for
the Operable Unit 7-13/14
Integrated Probing Project***

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**Idaho
Completion
Project**

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**Field Sampling Plan for Monitoring Type B Probes
for the Operable Unit 7-13/14
Integrated Probing Project**

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ABSTRACT

Various types of probes are being installed in the Subsurface Disposal Area of the Radioactive Waste Management Complex at the Idaho National Engineering and Environmental Laboratory. The probes are part of the Operable Unit (OU) 7-13/14 integrated probing project that will collect subsurface contamination data. The data will verify and validate the OU 7-13/14 comprehensive remedial investigation/feasibility study and support selection of remedial alternatives in the record of decision. Type A probes will be installed first, and will be monitored with nuclear logging devices. Data from the Type A probes will be used to site the following Type B probes: tensiometers, suction lysimeters, vapor ports, and visual, moisture, and geochemical probes.

This field sampling plan describes how and where Type B probes will be installed, how samples will be collected from the Type B probes, and how the Type B probes will be monitored.

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ACRONYMS

| | |
|--------|--|
| ALS | alpha spectrometry |
| bgs | below ground surface |
| CERCLA | Comprehensive Environmental Response, Compensation and Liability Act |
| CSA | CERCLA storage area |
| CY | calendar year |
| DOE | U.S. Department of Energy |
| DOT | U.S. Department of Transportation |
| DU | depleted uranium |
| EDF | engineering design file |
| FSP | field sampling plan |
| GC/MS | gas chromatography/mass spectrometry |
| GFP | gas flow proportional |
| GMS | gamma spectrometry |
| HDPE | high-density polyethylene |
| HEPA | high-efficiency particulate air |
| ICPP | Idaho Chemical Processing Plant |
| ICP/MS | inductively coupled/mass spectrometry |
| INEEL | Idaho National Engineering and Environmental Laboratory |
| INTEC | Idaho Nuclear Technology and Engineering Center |
| IWTS | Integrated Waste Tracking System |
| LEPS | low-energy photon scintillation |
| LLW | low-level waste |
| LSC | liquid scintillation |
| OCVZ | organic contamination in the vadose zone |
| OU | operable unit |
| PCB | polychlorinated biphenyl |
| PPE | personal protective equipment |

| | |
|-------|--|
| QA | quality assurance |
| QAPjP | Quality Assurance Project Plan |
| RCRA | Resource Conservation and Recovery Act |
| RDL | required detection limit |
| RFP | Rocky Flats Plant |
| RI/FS | remedial investigation/feasibility study |
| ROD | record of decision |
| RWMC | Radioactive Waste Management Complex |
| SDA | Subsurface Disposal Area |
| SVR | soil vault row |
| SMO | Sample Management Office |
| SOW | statement of work |
| TPR | technical procedure |
| TRA | Test Reactor Area |
| TRU | transuranic |
| TSA | Transuranic Storage Area |
| VOA | volatile-organic analysis |
| VOC | volatile organic compound |
| WAC | waste acceptance criteria |
| WAG | waste area group |
| WGS | Waste Generator Services |

Field Sampling Plan for Monitoring Type B Probes for the Operable Unit 7-13/14 Integrated Probing Project

1. INTRODUCTION

1.1 Purpose

This field sampling plan (FSP) describes how newly installed Type B probes in the Subsurface Disposal Area (SDA) at the Radioactive Waste Management Complex (RWMC) at the Idaho National Engineering and Environmental Laboratory (INEEL) will be monitored, and how samples will be collected. Information gained from this effort will be used to support assessment of the following: (1) infiltration through the waste, (2) release rate and solubility of uranium, (3) release rate of C-14, and (4) mass of the volatile organic compound (VOC) source remaining. The results will support the Operable Unit (OU) 7-13/14 integrated probing project and ultimately verify and validate the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) -based (42 USC § 9601 et seq.) OU 7-13/14 comprehensive remedial investigation/feasibility study (RI/FS). Operable Unit 7-13/14 is the comprehensive OU for Waste Area Group (WAG) 7, which comprises the RWMC.

1.2 Scope

The work described in this FSP will verify and validate the comprehensive OU 7-13/14 RI/FS under the *Federal Facility Agreement and Consent Order and Action Plan* (DOE-ID 1991). This FSP describes how Type B probes will be monitored and how samples will be collected from instrumented Type B probes installed as part of the OU 7-13/14 integrated probing project at the RWMC. Various types of probes are being installed in the SDA to support this project. The first phase of probing used Type A probes that were successfully installed in Pit 9 for the OU 7-10 staged interim action project. These Type A probes were monitored using nuclear logging devices, and the resulting data were used to site the Type B probes installed as the second phase of the integrated probing project. This FSP focuses on Type B probe location and monitoring. Data obtained from Type B probes will help fill previously identified data gaps (INEEL 2000; Day et al. 2001).

Type B probes include tensiometers, suction lysimeters, vapor ports, and visual, soil moisture, and geochemical probes. The *Operable Unit 7-13/14 Plan for the Installation, Logging, and Monitoring of Probeholes in the Subsurface Disposal Area* (INEEL 2000), which is known as the Probehole Plan, outlines the general approach to the integrated probing project, while this FSP defines the specific sampling and monitoring requirements necessary to collect data from the Type B probes. The final locations of the Type B probes will depend on analyses of data being gathered from existing and future Type A probes.

This FSP and the *Quality Assurance Project Plan for WAGs 1, 2, 3, 4, 5, 6, 7, 10, and Deactivation, Decontamination, and Decommissioning*, (QAPjP) (DOE-ID 2004) together are considered the sampling and analysis plan for the Type B probe phase of the integrated probing project. This FSP has been prepared in accordance with INEEL Management Control Procedure (MCP) MCP-227, "Sampling and Analysis Process for CERCLA and D&D Activities." This FSP describes the field activities that are part of the investigation, and the QAPjP describes the processes and programs that ensure that the generated data will be suitable for the intended use.

1.3 Site Background

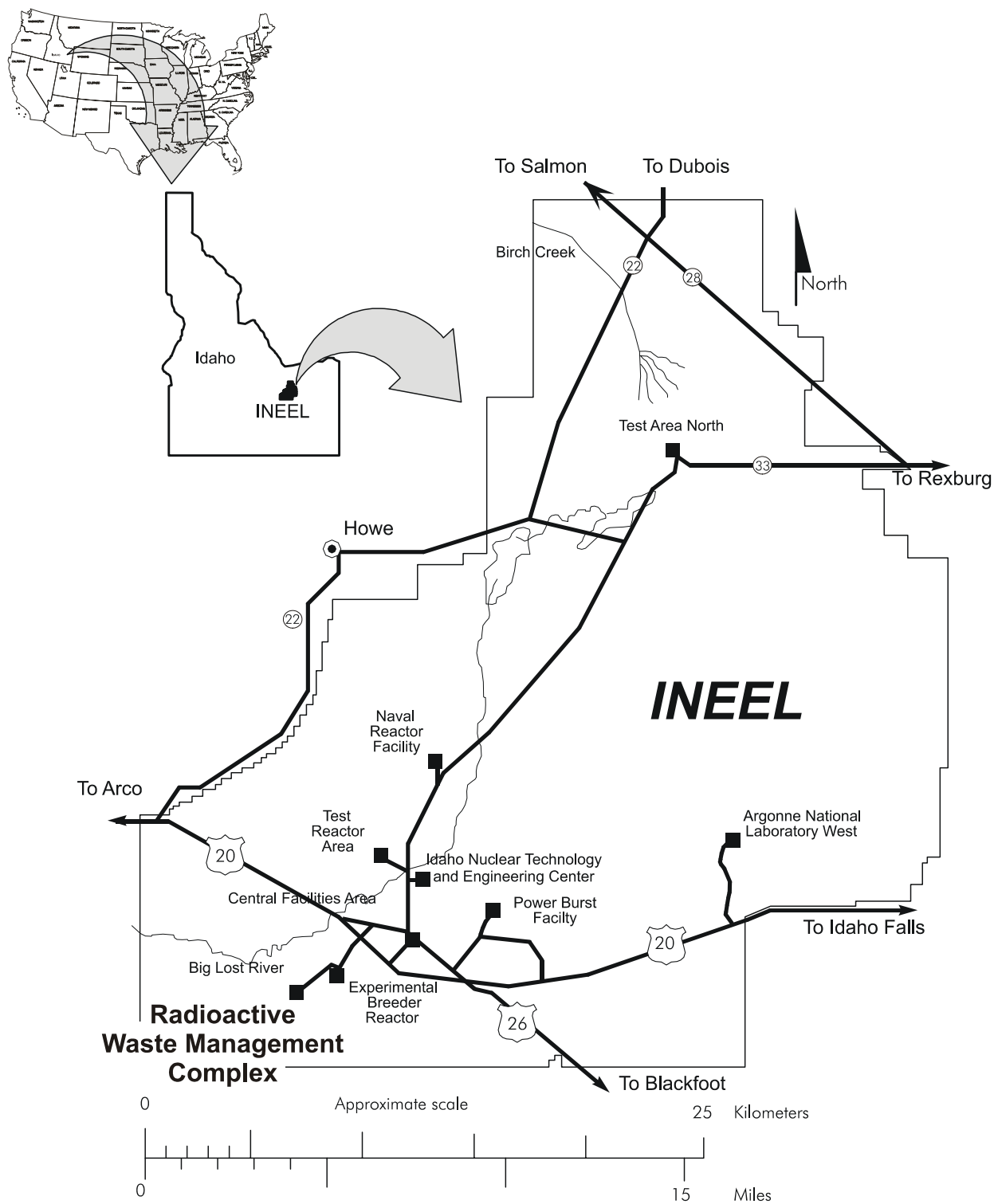
1.3.1 Site Location, History, and Use

The INEEL, located 42 mi (68 km) west of Idaho Falls, Idaho, occupies 890 mi² (2,305 km²) of the northwestern portion of the eastern Snake River Plain. The INEEL is bounded on the northwest by the Lost River, Lemhi, and Beaverhead mountain ranges. The remainder of the INEEL is bounded by the eastern Snake River Plain. Elevations on the INEEL range from 5,200 ft (1,585 m) in the northeast to 4,750 ft (1,448 m) in the southwest, with the average being 5,000 ft (1,524 m). The INEEL was established in 1949 by the U.S. Atomic Energy Commission to build, operate, and test various nuclear reactors and fuel processing plants and to provide support facilities. Today, the INEEL supports government-sponsored projects including energy, defense, environmental, and ecological research.

The RWMC is on the southwestern portion of the INEEL (see Figure 1). The facility encompasses three major operational areas: the SDA, the Transuranic Storage Area (TSA), and a combined operations and administration area. The SDA occupies 97 acres (39 hectares) of buried waste within the SDA and the TSA occupies 57.5 acres (23 hectares) of stored aboveground transuranic (TRU) waste. Since 1962, TRU waste and low-level radioactive waste have been buried in pits, trenches, soil vaults, and on one aboveground pad (Pad A) in the SDA. The waste also contains nonradioactive hazardous material, such as mercury, beryllium, asbestos, zirconium fines, solidified acids and bases, solvents and degreasing agents, and sodium and potassium salts. In 1970, the disposal of TRU waste in the SDA was discontinued when the TSA was established as an interim storage facility. Disposal of hazardous material ceased in 1983. Since then, only low-level radioactive waste has been disposed of in the SDA. In addition to interim storage, operations at the TSA include waste segregation, examination, and certification. The operations and administration area contains administrative offices, security and gatehouse operations, radiological control support, maintenance buildings, equipment storage, and miscellaneous support facilities. A more detailed summary of RWMC operations is in the OU 7-13/14 Interim Risk Assessment (Becker et al. 1998).

In addition to waste generated at the INEEL, waste from other U.S. Department of Energy (DOE) facilities, primarily the Rocky Flats Plant (RFP) in Golden, Colorado, was stored and disposed of at the RWMC. The SDA includes numerous pits, trenches, and soil vaults where radioactive and organic waste was placed, as well as a large pad where waste was placed above grade and covered (see Figure 2). The TSA has been used since the early 1970s for retrievable storage of TRU waste on earthen-covered pads and in facilities. The boundary of WAG 7 is defined as the RWMC fence, with the SDA as a fenced portion within the RWMC. The boundary includes all surface and subsurface areas. The current RWMC mission is to provide waste management for present and future needs of the INEEL and assigned DOE off-Site generators of low-level waste (LLW) and TRU waste, and to retrieve, examine, and certify stored TRU waste for ultimate shipment to the DOE Waste Isolation Pilot Plant in Carlsbad, New Mexico.

The majority of probeholes will be installed in Pits 4 and 10 in the three focus areas identified in the original 1999 Probehole Plan (Becker et al. 1999). Pit 4 was open from January 1963, to September 1967, and Pit 10 was open from June 1968, to July 1971. Each pit has an approximate surface area of 111,730 ft² (10,380 m²), and an average depth of 14.5 ft (4.4 m) (Becker et al. 1998). Some activities will also be conducted in Pits 5 and 6. Pit 5 was open from June 1963, to December 1966, and has an estimated surface area of 108,754 ft² (10,104 m²), while Pit 6 was open from May 1967, to October 1968, and has an estimated surface area of 54,984 ft² (5,108 m²). Waste buried in these pits was generated primarily by weapons production operations at the RFP and from various operations at the INEEL. The sludge and other waste material from RFP buried in the SDA contain a variety of radionuclides and organic and inorganic compounds. Other materials in the pits include LLW from the INEEL and small quantities of LLW from miscellaneous off-Site facilities. The primary focus of probes installed in these



WAG7JB97-004

Figure 1. Location of the Radioactive Waste Management Complex at the INEEL.

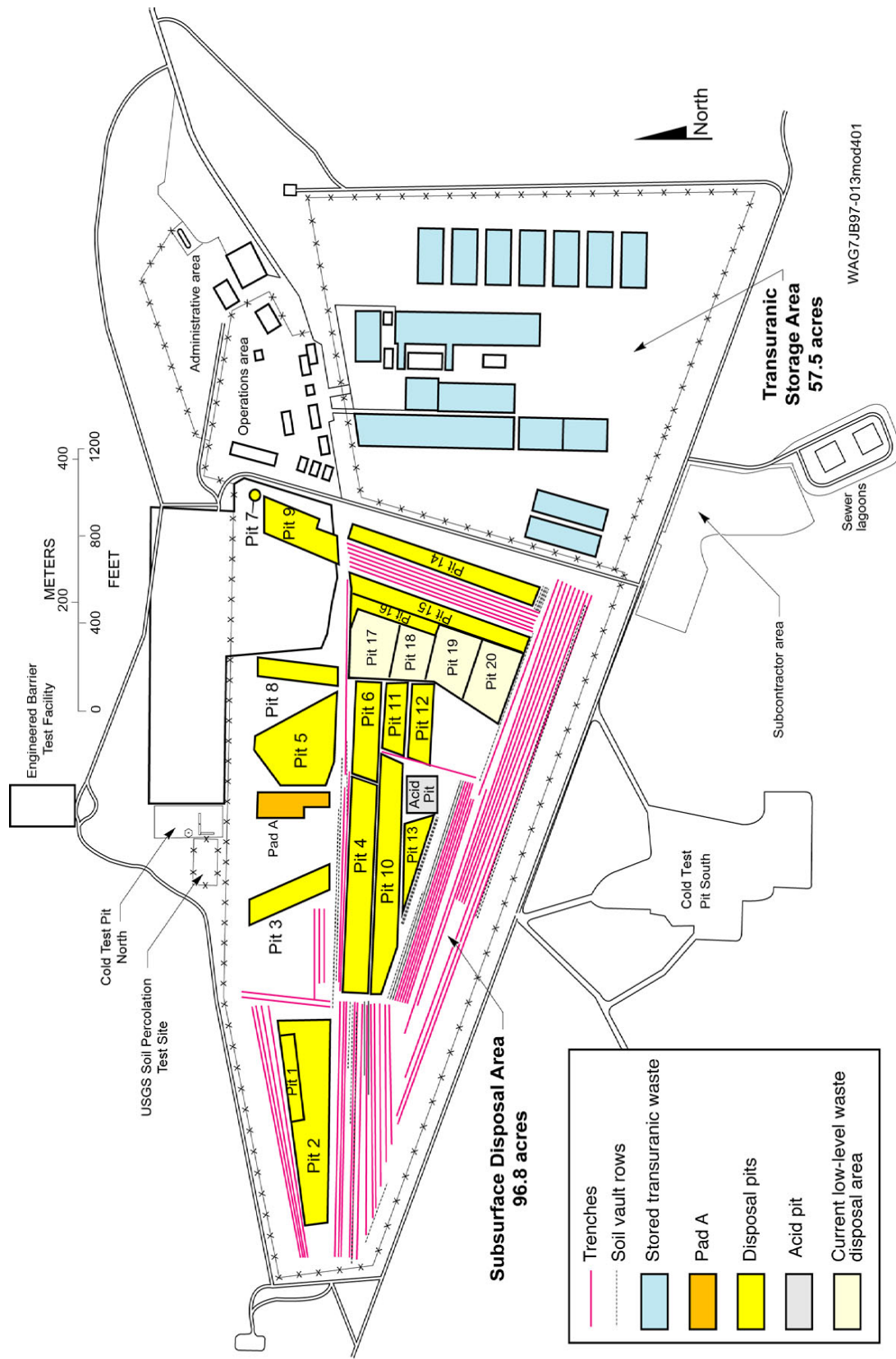


Figure 2. Physical layout of the Radioactive Waste Management Complex.

pits is to evaluate chlorinated VOCs, uranium, and high-activity americium and neptunium in the waste buried in the pits.

High-activity waste associated with soil vault row (SVR) disposal is also being investigated as part of this FSP. Because of possible exposure, this waste was buried in subsurface soil vaults augered into the RWMC subsurface. The materials being evaluated are activated beryllium and stainless steel. Soil vault disposal began in 1977 to minimize personnel exposure to ionizing radiation. The soil vaults were designed for disposal of high-radiation waste, defined as materials producing a beta-gamma exposure rate of greater than 500 mR/hour at a distance of 3 ft (0.9 m). The soil vaults are unlined vertical cylindrical borings ranging from 1.25 to 6.5 ft (0.4 to 2 m) in diameter and averaging about 12 ft (3.6 m) deep. If basalt had been penetrated during drilling of the soil vault, at least 2 ft (0.6 m) of soil was placed in the hole to cover the bedrock underlying the vault. Soil vaults are drilled in rows with individual vaults separated from their neighboring vaults in the same or adjacent rows by a minimum of 2 ft (0.6 m). The SVRs are located throughout the southern two-thirds of the SDA. Following placement, waste disposed of in-soil vaults was covered with several ft of soil.

1.3.2 Subsurface Disposal Area Geology

The SDA is located on the Snake River Plain of southeastern Idaho. The gently rolling terrain of this region is a result of geologically recent, basalt lava flows and associated volcanic features, such as cinder cones, vents, and pressure ridges. Soil is generally shallow to nonexistent, with the greatest thickness in the basalt depressions. Within the SDA, the maximum thickness of soil is about 30 ft (9 m). The bedrock in this region is a series of generally horizontal basalt flows separated by thin, discontinuous sedimentary interbeds. These basalt flows have morphology that varies from dense, massive material to vesicular or highly fractured rock containing lava tubes. The interbeds are composed of unconsolidated sediment, cinders, and volcanic breccia.

1.3.3 Subsurface Disposal Area Hydrogeology

Water movement in the vadose zone of the SDA is complicated. The properties of the sediment and basalt with which the water comes in contact and the matric potential gradients determine the direction and velocity of flow. At saturated or nearly saturated conditions, water within the SDA soil will generally flow downward until it reaches a relatively impermeable zone, such as a basalt flow or fine sediment overlying the basalt flow. Water will then flow nearly horizontally along the interface until it reaches a zone of higher permeability, such as a fracture zone, where it will move downward. Localized saturated conditions (e.g., near ditches) generally occur in the springtime because of rapid localized snow melt. Most of the year, the near-surface soil is not near saturation, and the general flow direction of the water in the topsoil zone is vertically upward because of evapotranspiration.

2. DESCRIPTION OF TYPE B PROBE INSTRUMENTS

The following six types of instrumented Type B probes are being monitored as part of this investigation:

- Tensiometers
- Soil moisture probes
- Lysimeters
- Vapor ports
- Visual probes
- Geochemical probes (pH and oxidation-reduction potential probes).

The general locations of the Type B probes were determined based on data gaps and waste disposal information. The specific locations of the Type B probes are being refined based on the results of the Type A probing and logging, which are discussed in the following section. This section describes general construction and primary use of each instrument. A technical and functional requirements document (INEEL 2001) was prepared which identified the technical and functional requirements for the systems, structures, and components supporting the Type B investigation. Type B probe design and construction are specifically described in the engineering design files (EDFs) referenced below. All but the visual probes are being installed in accordance with TPR-1672, "Type B Probe Installation." The visual probes are being installed in accordance with TPR-1673, "Type B Visual Probe Installation." The approach to vertical placement is described below for each type of instrument sensor or inlet port. Appendix A provides an interpretation of the contacts (i.e., plane of interest or the "contact" between the waste zone and underburden soil) between the waste and overburden and underburden soils surrounding the original Type A probes. The interpretation is based on Type A nuclear logging results. Also contained in Appendix A is a suggested vertical placement of completed Type B probes surrounding an existing Type A probe. The suggested vertical placement is based on the Type A logging interpretations and the suggested "generic" vertical placement given in the following subsections. It is recognized that optimal vertical placement of probes where no Type A data exist (e.g., Pit 6) will be approximate, as waste-soil contact information is essentially nonexistent.

2.1 Tensiometers

Tensiometers are used to measure the matric potential^a of a porous medium under unsaturated conditions or the pressure head if saturated conditions form. Matric potential is used to (1) calculate hydraulic gradients, (2) determine the direction of soil water movement in the vadose zone, and (3) calculate the rate of flow, given the hydraulic conductivity of the materials, determined from laboratory analysis of soil samples or assumed for the material in the waste zone. The EDF-ER-238, "OU 7-13/14 Integrated Probing Project OU 7-13/14 Tensiometer Probe Design," describes the construction and design specifications of the tensiometers installed for this investigation. Very specific elements were incorporated into the design of these tensiometers to mitigate concerns with open radiological pathways that would have been a concern with standard tensiometers.

a. The field (potential) describing the forces acting on soil water, independent of chemical and gravitational potential, that causes water to move through the soil.

Essentially, these tensiometers are long cylindrical tubes with a porous stainless steel section (0.2- μ pore size) connected to a drive point at the bottom for penetration through the soil and waste. The tube is separated into two different compartments or reservoirs (i.e., upper and lower). All sensors are carried with the instrument when installed.

The tensiometer has three tubing connections and two pressure-sensor wire leads. Two of the tubing connections are pneumatic air lines, which operate a series of filling and calibration spool valves. The two sensor leads are for pressure sensing of the lower porous reservoir and the surrounding soil by the instrument. The two pneumatic air lines are used for operation of the three spool valves. Maintenance (i.e., periodic addition of water) is required to be performed on the instrument to keep it operating correctly. Water is added to an upper reservoir (500-mL capacity) by evacuating the upper reservoir with a vacuum pump and then allowing water to be pulled back into the reservoir from a source at the surface. Water must be transferred from the upper to lower porous reservoir (65-mL capacity) by cycling a valve that separates the two reservoirs. Calibration of the sensors must also be performed on an as-required basis. Calibration is supported by cycling the other two spool valves.

Essentially, three operations can be performed from ground surface on the instrument. These operations include (1) filling the upper reservoir with water, (2) transferring water from the upper to the lower reservoir, and (3) checking the calibration of the two pressure sensors. There are no serviceable parts on the tensiometer from ground surface. Operations and maintenance of the tensiometer will be performed in accordance with TPR-1763, "Type B Tensiometer Operations and Maintenance (inactive)."

When the tensiometer is placed in unsaturated soil, water in the reservoir equilibrates with the soil water in the surrounding medium. During equilibration, which may require several days, water will be drawn from the reservoir through the porous steel and into the surrounding formation and a change in pressure head will occur in the tensiometer. The pressure transducer will measure the vacuum in the air and water column within the tensiometer, which is in equilibrium with the surrounding medium, to determine the matric potential of the surrounding medium.

The following items are functions of these tensiometers or the monitoring networks they support:

- Indication of the moisture state and its variability, spatially and temporally, within the waste zone
- Quantification of the amount and timing of infiltration through the waste zone
- Determination of the amount and lateral extent of the development of perched water toward the bottom of the waste zone.

During this investigation, each tensiometer will be bundled (i.e., placed as close together as possible) with two other tensiometers and a tripled (three sensors) soil moisture probe (described below). This will be considered a localized moisture-monitoring network. The tensiometers will generally be placed as close as possible to the following three vertical horizons:

- Overburden and waste contact
- Upper third of the waste zone
- Waste and underburden contact.

Because tensiometers measure negative pressure head under unsaturated conditions, it is advisable to offset other instruments that would affect these measurements. The suction lysimeters described below can affect local conditions surrounding tensiometers to the point that a response could be measured at the

tensiometer when a vacuum is applied to the lysimeter during water sample collection. In an extreme condition, the vacuum applied to the lysimeter could cause removal of the fluid contained in the porous cup of the tensiometer. Prior experience indicates that probes should be installed to maintain an offset of at least 2 ft (0.6 m) between tensiometers and lysimeters installed in the same vertical horizon to mitigate these conditions.

2.2 Soil Moisture Probes

The soil moisture probe indirectly measures the moisture content of soil using the relationship between the soil dielectric constant and the moisture content. The soil moisture content is determined by measuring the frequency shift of a high-frequency excitation signal as it passes through the soil. The probe can also perform resistivity surveys of the profile to measure the electrical contrasts between different geologic mediums and to measure temperature of the surrounding material.

The soil moisture probe module, which is being purchased commercially, is attached behind a drive point. The soil moisture electrodes are included as one of the sections of casing above the conical tip. In an ideal situation, three moisture probe sensors are attached to each probe for this application. When the soil moisture probe is the first probe being installed in an area, two probes may be installed instead of the ideal situation in which only one probe is installed, allowing a probe with a single sensor to be installed first to “tag”^b the waste underburden contact. Following the first probe installation, a “doubled” or two-sensor probe could be installed. Installing two probes will substantially mitigate scenarios in which sensors are installed closer to the surface than planned because refusal (i.e., the probe would not continue penetrating) was encountered at a shallower depth than anticipated.

The soil moisture probe is connected with a wire lead to a data logger where measurements are stored and downloaded periodically. The tube is sealed so there is no pathway from the sensing element to land surface. Only the data logger will be accessed for downloading. The EDF-ER-234, *OU 7-13/14 Integrated Probing Project Soil Moisture Instrumented Probe*, describes the specifications of the soil moisture probes installed for this investigation. The sensor depths are planned and installed in the probe prior to driving it into the ground. The assembly is pushed from ground surface to the planned depths. The sensors will generally be placed as close as possible to three vertical horizons and, with the exception of the middle moisture sensor, will be similar to the tensiometer porous cup placement. The three vertical horizons include:

- Overburden and waste contact
- Middle of waste zone
- Waste and underburden contact.

The reason for the difference in vertical placement between the middle tensiometer and middle sensor in the soil moisture probe is to maximize the amount of moisture-related monitoring coverage that could be done with the limited budget for probes. Project personnel determined that the effect of increased vertical coverage outweighed the results of not nesting the middle tensiometer and moisture sensor together, as had been originally planned.

b. Tag: A slang term commonly used in the drilling industry to denote identification of a point of interest in the subsurface. “Tagging” the contact, in the context of this plan, is placing a probe at the desired depth.

2.3 Lysimeters

Suction lysimeters are designed to collect soil water samples under either saturated or unsaturated conditions. To collect water, a partial vacuum is applied on the porous section of the lysimeter (porous stainless steel with a 0.2- μ pore size) that is in contact with the soil, and soil water is drawn into the lysimeter body. Water is removed from the suction lysimeter by applying positive pressure to the suction lysimeter, which pushes the collected water up a tube to the surface and into a sample container. The amount of water collected and duration of collection are dependent on the (1) available soil moisture, (2) soil water potential, (3) conductivity of the porous material in the lysimeter, and (3) vacuum applied. The sample volume is also limited to 1 L, the volume of the collection reservoir.

The push suction lysimeter used for the integrated probing project will be approximately 2.5 in. (7 cm) in diameter. The outside portion of the push suction lysimeter will be the same as the push tensiometer and will consist of a long cylindrical tube with a porous stainless steel section attached to a drive point at the bottom for penetration through the soil and waste. A pipe connects to the porous steel section and provides a conduit and protection for air lines and water lines that extend to the surface. The water line extends from the bottom of the lysimeter point to the surface. The air line is above the water reservoir and also extends to the surface. To operate the lysimeter, the water line is closed and a vacuum is applied to the lysimeter via the air line. When the desired vacuum is achieved, the valve on the lysimeter is closed off to hold the vacuum in the lysimeter reservoir. The lysimeter collects the soil water, decreasing the vacuum as water moves into the reservoir. The EDF-ER-236, "OU 7-13/14 Integrated Probing Project Type B Probes Lysimeter Probe Design," describes the construction and design specifications of the suction lysimeters installed for this investigation.

During installation, lysimeter bundles will generally be placed as close as possible to the following two vertical horizons:

- In or just below the targeted waste for that area
- Waste and underburden contact (or as deep as contact) with underlying basalt if higher moisture zones are probable.

Sample collection and analysis from lysimeters are discussed in later sections.

2.4 Vapor Ports

Commercially available vapor ports are being used to sample soil gas from the waste zones and the area surrounding the soil vaults in the SDA. The probe is pushed into place and will be left as a permanent installation. After installation, the sample tube is terminated at ground surface with a fitting so the port can be accessed. The EDF-ER-235, "OU 7-13/14 Integrated Probing Project Vapor Port Instrumented Probe," describes the specifications of the vapor ports installed for this investigation. Two "filters" are incorporated to prevent larger particles from entering the probe sample chamber. The outer "filter" is a 254- μ stainless steel perforated cylinder. The inner filter is a 38- μ stainless steel screen attached directly behind a drive tip. Soil-gas samples will be collected above ground by applying a vacuum to the vapor port line.

During this investigation, each vapor port will be bundled (i.e., nested) with two other vapor ports. The bundled vapor ports will generally be placed as close as possible to the following three vertical horizons:

- Just below the overburden and waste contact.
- Middle of waste zone, or in close proximity to a desired source.
- Just above (approximately 8 in. [20 cm], if possible) the waste and underburden contact. Ideally, this probe will be placed just above where perched water, if present, would cause the probe to be ineffective for its intended purpose.

2.5 Visual Probes

Visual probes consist of Lexan tubes that allow visual logging devices (e.g., video cameras) to be lowered down through them to allow direct visual examinations of the environment in and beneath the waste zone. The Lexan tubes are resistant to chemical attack. Being able to visually inspect the tubes and their integrity allows the unique opportunity to monitor the status of the tubes and to plan to abandon them in place should they appear to be approaching failure. The EDF-ER-237, “OU 7-13/14 Integrated Probing Project Type B Visual Probe Design,” describes the construction and design specifications of the visual probes installed for this investigation.

2.6 Geochemical Probes

Geochemical probes will be used to monitor pH, oxidation-reduction potential, and temperature in the subsurface of the SDA. These probes are currently under development. They are expected to be usable only under saturated conditions, and the lifetime of the probe may be limited to 1.5 years.

3. SAMPLING OBJECTIVES, LOCATION, AND FREQUENCY

This section details the objectives, location, and proposed sampling frequency of Type B probes installed in the SDA. High-level sampling objectives, analytical suites, and general sampling locations (e.g., focus areas) were previously presented in the Probehole Plan. Transects (i.e., horizontal positioning of probes over a relatively straight line) of Type A probes were proposed for the focus areas in the Probehole Plan and subsequently installed and logged between the summer of 2000 and the spring of 2001. Specific placement of Type B probes was dependent upon the results of Type A nuclear logging efforts. This FSP uses results gained from the logging to locate specific clusters of Type B probes but does not go back and reiterate reasons for selecting the general focus areas.

This FSP is designed to provide a framework for sampling operations but cannot predict exact specifications in every case. Minor deviations from the specifications in this FSP that do not affect health and safety can be made without revising this FSP. However, concurrence on the change must be reached between health and safety and project personnel, and the justification and concurrence (e.g., change caused by field conditions or programmatic requirements) must be recorded in the sampling logbook or other appropriate report. If a change to a work control document (such as a technical procedure [TPR] or a radiological work permit) is necessary, work may not proceed until the change is made to the work control document.

Data gaps were identified and investigations to fill those gaps were specified to be included in the OU 7-13/14 RI/FS as part of the Interim Risk Assessment and Work Plan Addendum for OU 7-13/14 (DOE-ID 1998). Because changes in the OU 7-10 scope impact those planned investigations, data needs have been reevaluated. This reevaluation looked at more recent information and focused on data gaps that could impact the choice or cost of any remedial action selected for the SDA. A preliminary set of data quality objectives was identified and will be used to guide the remedial investigation. Feasibility study data needs will be addressed via treatability studies, which are outside the scope of this investigation. The subset that can be achieved through the integrated probing project is addressed by this investigation.

The largest uncertainty identified qualitatively in the Interim Risk Assessment was the source release modeling. Sampling and direct measurement with instrumented probes within the waste zone is one way to acquire contaminant release data and reduce this uncertainty. Four principal data gaps will be addressed by the integrated probing project, as identified in the 1999 Probehole Plan (Becker et al. 1999) and the Waste Area Group 7 Operable Unit 7-13/14 Data Quality Objectives Report (Day et al. 2001). These are (1) infiltration through the waste, (2) release rate and solubility of uranium, (3) release rate of C-14, and (4) mass of VOC source remaining. These four gaps are further described below:

- How much water infiltrates through the waste, and do local saturated conditions enhance contaminant release? Both of these questions help answer if there is a driving force for contaminant movement. Currently, all infiltration monitoring has been done in areas outside the waste so that the modeling uses infiltration rates for subsurface conditions that differ from the waste zones. Shakofsky (1995), in an investigation of infiltration into a simulated waste trench just north of the SDA, observed there was a likelihood of increased infiltration in a disturbed setting. Changes in the prescribed infiltration rate used in the flow and transport modeling could have a large impact on the predicted concentrations and risks, and could impact which contaminants need remediation. Infiltration through the waste affects all of the other data gaps and, in large part, will drive the remedy selection process. Contaminant movement is dependent on the moisture content and the timing and amount of infiltration. The moisture content also controls the corrosion rate of any metal container and the eventual release from the waste form.
- Does a VOC source mass remain? Uncertainties in the mass of VOC released from the waste to the atmosphere preclude an accurate estimate of the mass remaining in the source. The remedy selected for the comprehensive record of decision (ROD) will have to be compatible with the mass remaining, or the VOC mass will have to be removed. In addition to the nuclear logging already

performed, collection of VOC samples from vapor ports within the waste should yield an indication of whether significant quantities of VOCs remain.

- What are the physical and chemical forms of the uranium waste, and is uranium waste migrating from the original source? Conservative assumptions about the form of disposed uranium were used in the Interim Risk Assessment, resulting in predicted health risks from uranium. The validity of these assumptions will be evaluated using, in part, leachate samples collected from known uranium disposals in the SDA.
- How rapidly is C-14 released to the environment and in what form? Most of the C-14 is in activated metals or beryllium blocks. The lack of site-specific data causes uncertainties in the release rate for C-14. Conservative assumptions used in the Interim Risk Assessment show a potential health risk from C-14. The validity of these assumptions will be evaluated using both water and vapor samples collected from known C-14-bearing waste disposals in the soil vaults in the SDA.

3.1 Analytical or Data-Gathering Approach

3.1.1 Data-Gathering Approach for Tensiometers

The objective in placing tensiometers (and moisture sensors, as discussed below) is to obtain both qualitative and quantitative information on the amount of water contacting waste in the pits. The objective in placing these instruments is to obtain this information both at the three primary targeted waste locations identified during the Type A investigative activities and at other representative locations. Other locations include placement (1) in slight surface depressions, (2) in slight surface high spots, (3) near ditches, (4) in areas where the undulating basalt surface results in local depressions that could lead to development of perched water, and (5) at some other locations (e.g., SVRs) described later in Section 3.

Two major classes of locations for tensiometer installation are identified as (1) targeted waste locations, and (2) ditch influence locations. These latter locations may be adjusted to include surface depressions identified just prior to installation (i.e., from localized settlement). Thirty tensiometer probe bundles^c (90 probes) are planned for installation in support of this investigation. This number was determined subjectively by considering cost, data management and analysis requirements, and adequacy of coverage for determining infiltration. At each individual location, three drive-point tensiometers will be installed to enable quantitative determination of matric potential gradient information.

Upper basalt surface topography data (see Figure 3) indicate a possibility of lateral movement of saturated water toward Pits 4 and 10 from both the north and the south. Interpretive arrows are superimposed on the figure to show likely areas where water would accumulate. Data control points for the basalt surface topography are generally much sparser inside Pits 4 and 10 than outside the pits.

c. In the context of this plan, “probe bundle” is used to describe probes planned to be installed as a group. For example, tensiometers are always planned for installation in a group of three (i.e., five bundles of tensiometers would consist of 15 tensiometers).

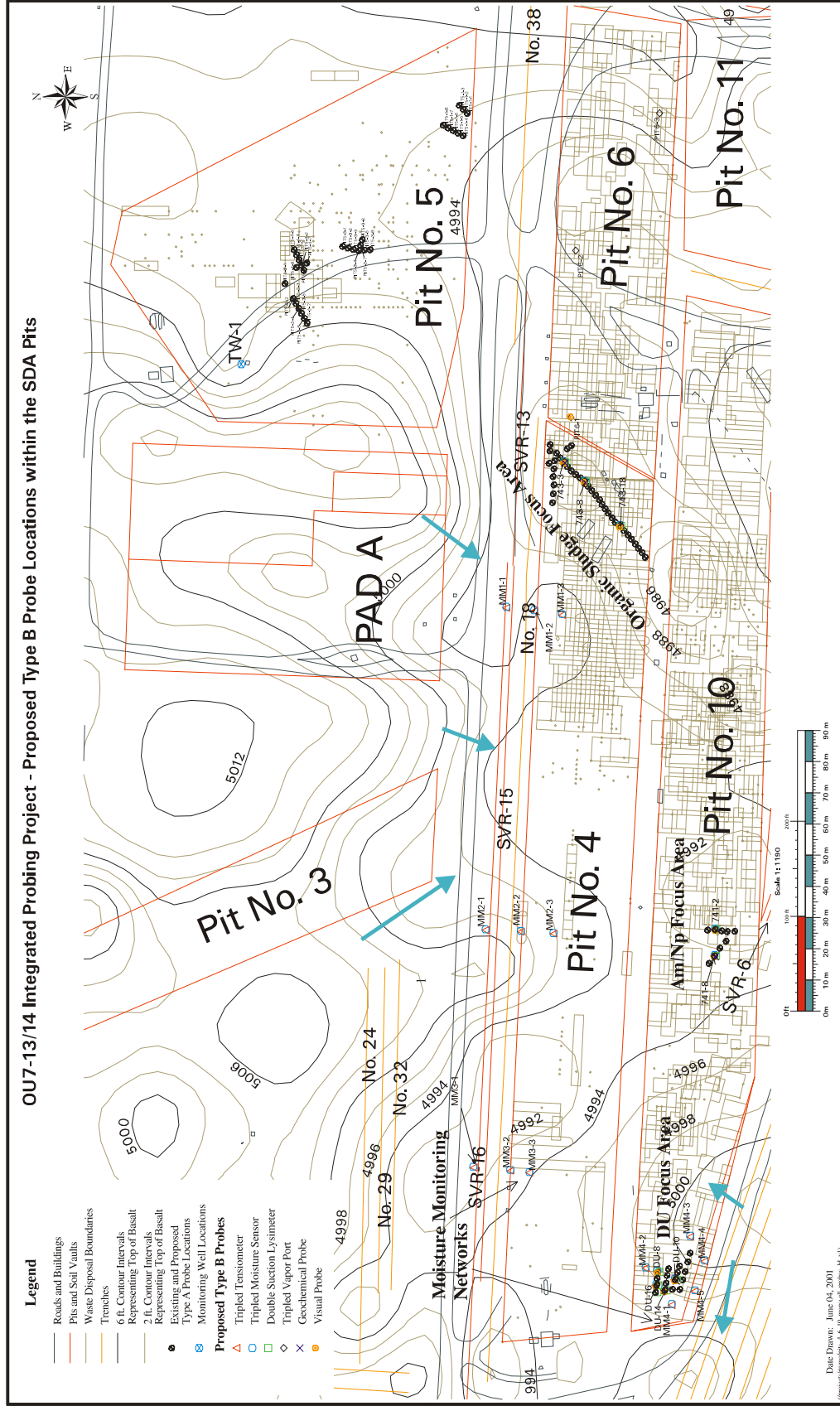


Figure 4 shows the SDA areas that had significant ponding during the February 1995 melt. This melting and water accumulation pattern was similar to the ponding that occurred in 1993, 1994, and 1996. The figure shows ponding in ditches nearly all the way around the perimeter of Pits 4, 6, and 10. Some monitoring locations will be located to determine the extent of lateral movement away from these ditches into the waste zone. Three transects of instruments located on the north side of Pit 4 are indicated for this purpose, and one area, containing five bundles of tensiometers, is located in Pit 10 for the same purpose.

The tensiometer pressure transducer is connected to a data logger where measurements are stored and periodically downloaded. Initial measurement frequency will be approximately every 2 hours, and data will be downloaded at regular intervals. Measurement frequency may decrease after several months, depending on the potential for infiltration. If the potential for infiltration is low, measurement frequency may decrease to something on the order of every 6 hours. As potential for infiltration increases (e.g., snow melt or standing water in ditches), measurement frequency may also be increased. Precision and accuracy of the advanced tensiometer, upon which the design of the push tensiometer is based, is within ± 4 in. (± 10 cm) of water, which applies to both the soil underburden and soil within the waste.

Single-point (one per vertical profile) tensiometers will yield matric potential measurements that will be used to determine changes related to infiltration or drainage in moisture state over time, and to determine the extent of infiltration, depending on the depth of tensiometer placement.

Two or more appropriately positioned nested tensiometers will provide measurements that will be used to calculate gradients to determine direction of water flow, and to quantitatively estimate net infiltration through the underburden into the underlying basalt (assuming the hydraulic conductivity of the underburden) based on existing laboratory data from surrogate soil samples. Confidence in net infiltration estimates will be heavily dependent on the hydraulic conductivity used for the underburden.

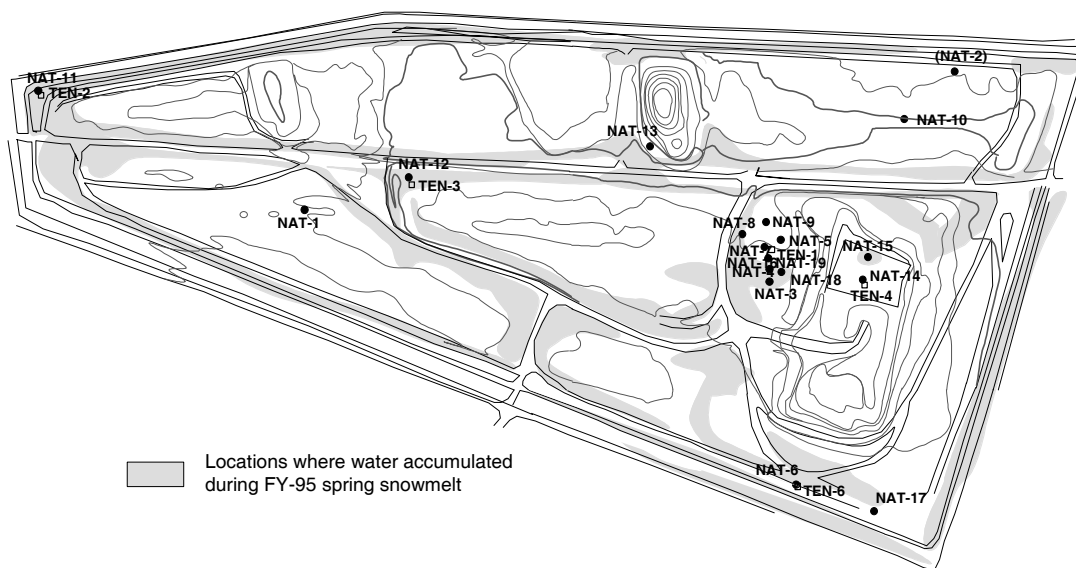


Figure 4. Locations at the Subsurface Disposal Area showing significant ponding during February 1995 (Bishop 1996).

3.1.2 Data-Gathering Approach for Soil Moisture Probes

The soil moisture probes will be capable of measuring moisture content at up to three elevations in each probe. These probes will always be bundled with nested tensiometers to ensure comparability of data in terms of location. Moisture content measurements cannot be calibrated to the waste or interstitial soil. However, relative changes in moisture content (i.e., decreasing or increasing values) will indicate infiltration or net drainage of water. Moisture content measurements within the underburden soil are expected to exhibit a precision and accuracy of $\pm 8\%$ moisture content. The long-term precision and accuracy of these instruments (i.e., beyond 3 months) have not been proven in the field. The measurement frequency made by the soil moisture probes will closely follow that established for the tensiometers.

Moisture content sensors will yield soil moisture measurements that will be used to determine the following items:

- Relative changes in moisture over time, related to infiltration or drainage. These will corroborate and supplement matric potential measurements from tensiometers.
- Extent of infiltration, depending on depth of probe placement. These will corroborate and supplement matric potential measurements.
- A lower bound on the order of magnitude for net infiltration and drainage at the depth of the probe. The accuracy of the moisture content measurements is expected to be higher in the soil underburden than within the waste.

The measurements of matric potential from the tensiometers to determine direction of flow, along with concentrations of contaminants from water samples (collected from lysimeters) and changes in water content (e.g., drainage), are combined to provide an estimate of contaminant flux rates in the vadose zone. The soil moisture probes will also be used to measure temperature in the surrounding soil. These data will be used as input to source term release modeling applications.

3.1.3 Data-Gathering Approach for Lysimeters

Because of uncertainty regarding radionuclide concentrations in the water recovered from the lysimeter and in the retrievable sample volumes, the first round of analyses is expected to be conducted at the INEEL radiochemical laboratories located at the Test Reactor Area (TRA) and the Idaho Nuclear Technology and Engineering Center (INTEC). This FSP outlines various sampling and analysis requirements to support onsite analysis of these water samples. After the radiological content of the samples is baselined, samples may be sent to approved offsite analytical laboratories. If other laboratories are used, analytical methods, including sample size and preservation, may differ from those specified in this FSP. As long as the analyses are in accordance with an INEEL Sample Management Office (SMO)-approved task order statement of work (SOW), minor changes will not require a modification of this FSP.

Water samples are being analyzed for two different analytical suites under this FSP, depending on origin. Samples collected from the pits will be analyzed in accordance with the analytical suite shown in Table 1. These are essentially the current OU 7-13/14 prioritized analytes (DOE-ID 1998) specified by the Probehole Plan. Concentrations over time will yield information on trends that will be compared to the source term modeling done for the OU 7-13/14 RI/FS. Although there may not be data available to support source release modeling improvements prior to initiation of the RI/FS, some monitoring data will be available to support the modeling prior to the ROD. Additionally, the monitoring data will be very useful in evaluating the appropriateness of the source term model in the 5-year review cycle after the ROD. The source term model chosen to support the OU 7-13/14 RI/FS is the Disposal Unit Source Term (DUST) model (Sullivan 1993). Water samples collected near the activated stainless steel in soil vaults will be analyzed in accordance with the suite identified in Table 2.

Table 1. Required detection limits and support information for Type B lysimeter samples collected from the Subsurface Disposal Area pits.

| Analyte | Required Detection Limit (pCi/L or mg/L) | Approximate Count Time (minutes) | Minimum Sample Volume | Field Preservative and Bottle | Methods | Onsite Laboratory | Priority |
|---|--|--|-----------------------|--|---|---|----------|
| Gamma-emitting radionuclides | <200 (Cs-137) | TBD but 1,000 minutes likely due to low RDL (required detection limit) | 50 mL | HNO ₃ , pH <2 1-L fluorinated HDPE (high-density polyethylene) or Teflon | GMS (gamma spectrometry) | Idaho Nuclear Technology and Engineering Center (INTEC) | 1 |
| Am-241 | <2 | 480 | Combine with gamma | | ALS (alpha spectrometry) | INTEC | |
| Pu-238 | <2 | 480 | Combine with gamma | | ALS | INTEC | |
| Pu-239 | <2 | | | | | | |
| Pu-240 | <2 | | | | | | |
| U-234 | <2 | 480 | Combine with gamma | | ALS or ICP/MS (inductively coupled/mass spectrometry) | INTEC | |
| U-235 | <2 | | | | | | |
| U-238 | <2 | | | | | | |
| Np-237 | <2 | 480 | Combine with gamma | | ALS | INTEC | |
| Tc-99 | <15 | 480 | Combine with gamma | | LSC (liquid scintillation) or GFP (gas flow proportional) | INTEC | |
| C-14 | <50 | 480 | 40 mL | HDPE | LSC or GFP | Test Reactor Area (TRA) | 2 |
| I-129 | <40 | 480 | 50 mL | Amber glass (6-month hold time) HDPE (28-day hold time) | LEPS (low-energy photon scintillation) | INTEC | 3 |
| H-3 | 250 | 480 | 20 mL | HDPE | LSC | INTEC | 4 |
| Nitrate and nitrite | ER-SOW-394 | N.A. | 15 mL | 4°C Note 48-hour hold time 30-mL HDPE | | INTEC | 5 |
| Appendix IX metals (without mercury) | ER-SOW-394 | N.A. | 50 mL | 4°C Combine in 1-L gamma spec bottle | | INTEC | 6 |
| Appendix IX VOA (volatile-organic analysis) | ER-SOW-394 | N.A. | 20 mL | H ₂ SO ₄ , pH <2, 4°C, no headspace, 20 mL VOA vial | GC/MS (gas chromatography/mass spectrometry) | INTEC | 7 |

Table 2. Required detection limits and support information for Type B lysimeter samples collected from soil vaults containing activated metal.

| Analyte | Required Detection Limit (pCi/L or mg/L) | Approximate Count Time (Minutes) | Minimum Sample Volume | Field Preservative/Bottle | Methods | Priority |
|--------------------------------------|--|---|-------------------------------|---|---|----------|
| Gamma-emitting radionuclides | <200 (Cs-137) | TBD but 1,000 minutes likely due to low RDL | 50 mL | HNO ₃ , pH <2 1-L fluorinated HDPE or Teflon | Gamma spectrometry (GMS) | 1 |
| Tc-99 | <15 | 480 | NA (use of gamma spec sample) | Combine with gamma (use gamma sample after gamma analysis) | Liquid scintillation (LSC) or gas flow proportional (GFP) | |
| C-14 | <50 | 480 | 40 mL | HDPE | LSC or GFP | 2 |
| H-3 | 250 | 480 | 20 mL | HDPE | LSC | 3 |
| Ni-59 | 400 | 1,000 | 50 mL | Combine in 1-L bottle with gamma | LEPS, GFP, or LSC | 4 |
| Ni-63 | 50 | 300 | 50 mL | Combine in 1-L bottle with gamma | LEPS, GFP, or LSC | 5 |
| I-129 | <40 | 480 | 50 mL | Amber glass (6-month hold time) HDPE (28-day holding time) | LEPS | 6 |
| Appendix IX metals (without mercury) | ER-SOW-394 | N.A. | 50 mL | 4° C Combine in 1-L bottle with gamma | | 7 |

Water samples are expected to be collected quarterly from lysimeters, with flexibility to change the frequency, as needed. The amount of water collected and duration of collection are dependent on the available soil moisture, the conductivity of the porous material in the lysimeter, and the level of vacuum applied. The TPR-1674, "Glove Bag Supported Sample Acquisition from Type B Probes in the SDA," contains the lysimeter sampling procedure and gives limits for the amount of vacuum that should be applied. The time required to collect a sufficient sample following placement of a vacuum on the probe is expected to be approximately 7 days. However, waiting too long could allow for the collected sample to be drawn back to the formation, while not waiting long enough could minimize the volume of the sample that would have otherwise been available for collection. The optimum time required between application of the vacuum and collection of the sample is expected to vary between lysimeters and season of the year. Judgment gained through several rounds of sampling will be used to further optimize this time period.

Note: Exceeding the stated limit may severely compromise the lysimeter, as water in the porous steel could be drained and allow air to pass through (making it inoperable).

Opportunistic samples may also be collected, as required by future programmatic needs. This may include samples for currently unspecified analysis (e.g., hexavalent chromium, depending on total chromium results). In such cases, the analyses will be identified by the task order SOW issued by the INEEL SMO. Appendix B contains the SMO sample plan tables for the first round of samples collected during this investigation.

If insufficient sample volume is collected to analyze all constituents identified in the tables, the analytical priority listed in the column on the right hand side of the tables will be used as a guide for prioritizing analyses. Project objectives and analysis performed during a previous round of sampling may alter the priority in the table(s). To make the lysimeter functional, the porous stainless steel screen is required to be saturated with water during installation. This added water will have an adverse consequence. It will cause slight dilution of the initial samples until this small amount of water is completely replaced with the surrounding formation water. This is an unavoidable consequence when first sampling lysimeters.

The installation procedure, TPR-1672, specifies that non-INEEL water will be used for the saturation step. This will mitigate potential tritium contamination from non-SDA based INEEL sources.

3.1.4 Data-Gathering Approach for Vapor Ports

Three different analytical parameters have been identified for analysis of vapor port gas samples, depending on sampling origin. Vapor port samples, collected in the pits, will be analyzed for VOCs. Samples collected from vapor ports near the SVRs will be sampled for C-14 or C-14 and tritium, depending on origin.

3.1.4.1 Volatile Organic Compound Samples Collected from Vapor Ports Located in the Pits. In accordance with the strategy developed in the Probehole Plan, a multigas monitor (i.e., Brüel & Kjaer [B&K] photoacoustic analyzer) was suggested for VOC analyses of vapor samples collected from the pits. The VOCs identified for analyses were carbon tetrachloride (CCl₄), trichloroethene (TCE), chloroform (CHCl₃), 1,1,1-trichloroethane (TCA), and tetrachloroethene (PCE). These are the same chlorinated VOCs being monitored in the soil gas surveys performed in support of the OU 7-08 organic contamination in the vadose zone (OCVZ) project.

Using an approach similar to that adopted by the OCVZ project is preferable from a cost perspective, and will ensure comparability of data by using similar methods and analytical suites. Essentially, the vapor-phase VOCs being monitored as part of the Type B probing project are from the same source as the VOCs sampled during the soil-gas surveys supporting the OCVZ project. The difference is that the samples collected from Type B vapor ports will be collocated within the waste (i.e., either in or around), while the samples collected in support of the OCVZ project have been from collection points in the overburden soil or in monitoring wells located outside of the pits (i.e., outside the waste).

Either the B&K Model 1302 photoacoustic multigas monitor currently in use in support of the OCVZ project, or the updated INNOVA^d Model 1314 photoacoustic multigas monitor is expected to be the primary instrument used for VOC vapor analyses. The measurement principles of these instruments are based on the photoacoustic infrared detection method. The instruments can measure almost any gas that absorbs infrared light (e.g., most chlorinated VOCs). Up to five optical filters are installed in the unit's carousel to enable selective analysis of up to five compounds at a time. The units compensate any

d. When B&K was split up in the 1990s, INNOVA was tasked with all B&K gas monitoring equipment development.

measurement for temperature fluctuations, water-vapor interference, and interferences from other gases known to be present.

A wide range of narrow-band optical filters is available from the instrument supplier. The selectivity of the analysis is determined by selection of these narrow-band filters. Filters are selected by studying the absorption spectra of the gases to be monitored, as well as those of any other gases found in the same air being monitored. The vendor supplies a gas detection limits chart to aid in the filter selection, and also supplies expert assistance. The gas detection limits chart and support provided by the vendor were used to select the filters for the Type B investigation.

Water vapor, which is almost always present in ambient air, absorbs infrared light at most wavelengths so that regardless of which optical filter is used, water vapor will contribute to total acoustic signal in the analysis cell. A special optical filter, permanently installed in the unit, allows water vapor contribution to be measured separately. The instrument then automatically compensates for the water vapor interference. One of the main limitations of the technology is that most organic gases absorb energy over a wide range of the infrared spectrum, making measurements susceptible to interferences. The unit allows for compensation of known interferences, however, sample matrices with unknown interferences could result in erroneous measurements (EPA 1998). By installing an optical filter to selectively measure the concentration of the interferent gas, the user can set up the instrument to compensate for the interferent gas contribution.

The VOC samples are expected to first be collected on a quarterly basis. After a baseline is established, sampling frequency may be reduced and will be determined at a later date.

3.1.4.2 Optical Filter Selection. Immunity to interfering species is an important consideration to mitigate interference during analysis. Concentration and type of potentially interfering gases are important aspects in optical filter selection. As a result, previous analytical data from the soil gas surveys around the SDA were evaluated to support selection of optical filters. Table 3 shows the compounds of interest, maximum concentrations detected for those compounds from soil-gas monitoring in the SDA (1998 survey at Pit 4), and the recommended optical filters and their corresponding analytical detection ranges. Appendix C contains a more complete evaluation of the optical filters selected and the corresponding errors that are anticipated from this selection.

Note: Other parameters may be evaluated with additional instruments or a change in optical filter selection. A change to the instrument's optical filters would typically require that the instrument be sent back to the manufacture's representative for calibration and testing.

Table 3. Compounds of interest, maximum concentrations detected from soil gas monitoring, and recommended optical filters.

| Name | Formula | Molecular Weight | Maximum Concentration (ppm) | Optical Filter | Range (ppm) |
|-----------------------|---|------------------|-----------------------------|----------------|---------------|
| Carbon tetrachloride | CCl ₄ | 153.80 | 7,260.0 | UA 0936 | 6 to 100,000 |
| Chloroform | CHCl ₃ | 119.40 | 1,550.0 | UA 0971 | 1 to 10,000 |
| 1,1,1-Trichloroethane | C ₂ H ₃ Cl ₃ | 133.40 | 208.0 | UA 0974 | 0.09 to 9000 |
| Trichloroethene | C ₂ HCl ₃ | 131.40 | 1,590.0 | UA 0975 | 0.3 to 10,000 |
| Tetrachloroethene | C ₂ Cl ₄ | — | 78.5 | UA 0976 | 0.04 to 4000 |

The photoacoustic infrared monitor will be operated in accordance with the manufacturer's instruction manual (i.e., INNOVA or B&K, as appropriate). Quality assurance (QA) requirements associated with these samples are included in Section 5.4.2.

3.1.4.3 Carbon-14 Samples Collected from Vapor Ports Located Near the Soil Vault

Rows. Carbon-14 sampling develops a baseline of data for the concentration of C-14 in the carbon (as C-14 Ci/g C) present as CO₂ in the soil gas. Carbon-14 may be collected using an existing method consisting of gas washing bottles (i.e., bubblers) filled with a base solution. ¹⁴CO₂ is trapped in the base-filled bubblers. The TPR-1571, "Soil Gas Sampling in the Soil Vault Rows and from the OCVZ VVET Stacks," describes the procedure for preparing and collecting these samples. In the event that programmatic funding limitations do not limit sampling, C-14 samples are expected to be collected quarterly from the vapor ports installed near SVRs. After a baseline is established, sampling frequency is expected to be reduced and will be determined at a later date.

3.1.4.4 Tritium Samples Collected from Vapor Ports Located Near the Soil Vault Rows.

The tritiated soil gas sampling system that will be established at SVR-20 consists of a vacuum pump, control unit, and glass moisture traps. It collects soil-gas samples drawn from the vapor port probes installed around the SVR-20 monitoring location. The purpose of this sampling is to detect and measure tritium content in the water vapor extracted from the SVRs. Samples are expected to be analyzed at the INEEL radiation measurements laboratory. The TPR-1571, "Soil Gas Sampling in the Soil Vault Rows and from the OCVZ VVET Stacks," describes the procedure for preparing and collecting these samples. In the event that programmatic funding limitations do not limit sampling, tritium samples are expected to be collected quarterly from the vapor ports installed near SVR-20. After a baseline is established, sampling frequency is expected to be reduced and will be determined at a later date.

3.1.5 Information Sought from Visual Probes

Approximately 13 probes are planned for installation in the pits. While most of the visual probes are located close to the targeted waste areas, several of the probes are located elsewhere for reconnaissance. In accordance with TPR-1671, "Visual Probe Logging Procedure," commercially available video equipment will be used to monitor the visual probes. The images will be recorded on standard videotape. The operator of the video camera will use professional judgment to determine the speed and orientation of the video camera during logging activities. To the extent possible, the visual probes will be used to verify, monitor, or evaluate the following within the waste zones:

- Location of top and bottom of the overburden and underlying sediment
- Thickness of sediment beneath the waste
- Relative grain size (e.g., cobbles, pebbles, sand, silt, or clay) to determine whether clay is on top of the basalt
- Stratification in the sediment beneath the waste or disturbance in the sediment
- Color of sediment beneath the waste for oxidation and reduction indication
- Amount of sediment versus waste adjacent to the tube in the waste zone
- Visual clues about moisture movement in the sediment
- Evidence of how tightly the tube is sealing in the sediment

- Evidence of burrowing animals (e.g., mammals or insects) in the backfill or evidence of root invasion
- Condition of the drums
- Void spaces caused by drum placement or lack of material
- Cellulose material (e.g., boxes, wood, or paper)
- Waste from identification (e.g., sludges, graphite, combustibles, nitrate salts, or noncombustibles).

Following the initial round of video logging and subsequent review, additional, more focused logging activities may be conducted to more fully address evaluation of the bulleted items above. Future video logging activities may be conducted on an as-needed basis. Visual probes are currently limited to spacing these probe types no closer than 5 ft (1.5 m) edge to edge. This criticality control requirement may be modified prior to probe installation.

3.1.6 Data Gathering from Geochemical Probes

Geochemical probes will be used to monitor pH, oxidation-reduction potential, and temperature in the subsurface of the SDA. These probes are currently under development and will be addressed at a later date, either as a revision to this FSP or in other documentation.

3.1.7 Sampling Frequency

This section summarizes the expected sampling frequencies for the data types described in the previous subsections. Table 4 lists these frequencies.

Table 4. Sampling frequencies expected for various probes types.

| Probe Type | Data Type | Type Location | Expected Frequency |
|---------------------|--|---------------|--|
| Tensiometer | Electronic | All | Initially every 2 hours |
| Soil moisture probe | Electronic | All | Initially every 2 hours |
| Lysimeter | Liquid water samples | All | Quarterly |
| Vapor port | Soil-gas samples for VOC analysis | Pits | Quarterly |
| Vapor port | Soil-gas samples for C-14 and tritium analysis | SVRs | Quarterly |
| Visual probe | Video log | Pits | Initial video logging and then as needed |
| Geochemical probe | Electronic | All | TBD |

3.2 Grouping Probes by Area of Investigation

This section details the placement of Type B probes in the SDA. It was prepared so that the probe installers could determine what instruments would be installed in each investigation area. It also describes the rationale for selecting the probe cluster^e location. The primary purpose of the clustering approach, which includes Type A as well as all Type B probes, is that release models can be calibrated by having information regarding the source mass, net infiltration, and leachate concentrations as a function of time.

e. The term “probe cluster” is used to describe the full suite of probes planned for placement around a specific target location (e.g., all Type B probes placed around a specific Type A probe).

Typically, clusters of Type B probes are being installed surrounding previously installed and logged Type A probes. Type A probe locations were originally sited based on an evaluation done in the Probehole Plan. This evaluation included a search of disposal records for key waste streams (e.g., depleted uranium [DU] and organic sludge). Disposals containing candidate waste were highlighted as an overlay over the pit boundaries using Geographic Information System software. These disposals are typically represented as numbered boxes on probe location figures provided later in this section. Based on the disposal location information and results of previous geophysical and soil-gas surveys, candidate locations were selected to install Type A probes. Results from the nuclear logging of these Type A probes were then used to site Type B probes.

In May 2001, following the initial nuclear logging performed on Type A probes, additional azimuthal or directional logging activities were conducted on selected probes. Essentially, specific zones of interest identified during the first phase of logging were directionally logged in an effort to investigate the spatial distribution of subsurface radionuclides, to select optimal locations for Type B clusters, and to optimize placement of lysimeters within the selected cluster locations.

At the present time, considerable uncertainty exists with respect to funding and probe availability (e.g., final numbers of Type B probes to be installed and additional Type A probing and logging activities). Therefore, the final probe cluster locations and numbers of probes installed are approximate. Depending on funding, additional Type A probes may be placed in arrays surrounding existing Type A probes of interest to support better source mass evaluations. The following subsections list possible probe cluster locations and distribution of probe types within the clusters. Because this initially planned approach may change, final “as built” information will be provided in a final closeout report detailing the probe completion.

Figure 5 represents a cross sectional view of a typical cluster containing one entire suite of probes installed in support of this investigation. Figure 6 represents the same probes from an isometric perspective. The isometric view of the probes indicates a typical arrangement of probes surrounding a target Type A location. Not all probe clusters contain every probe type identified by these figures. Specific clustering of probes is discussed in the sections below. The following investigative areas are discussed:

- Depleted uranium focus area
- Organic sludge focus area
- Americium and neptunium focus area
- Pit 5 investigation
- Pit 6 investigation
- Moisture monitoring network
- Activated metal (stainless steel), SVR-12
- Activated beryllium, SVR-20.

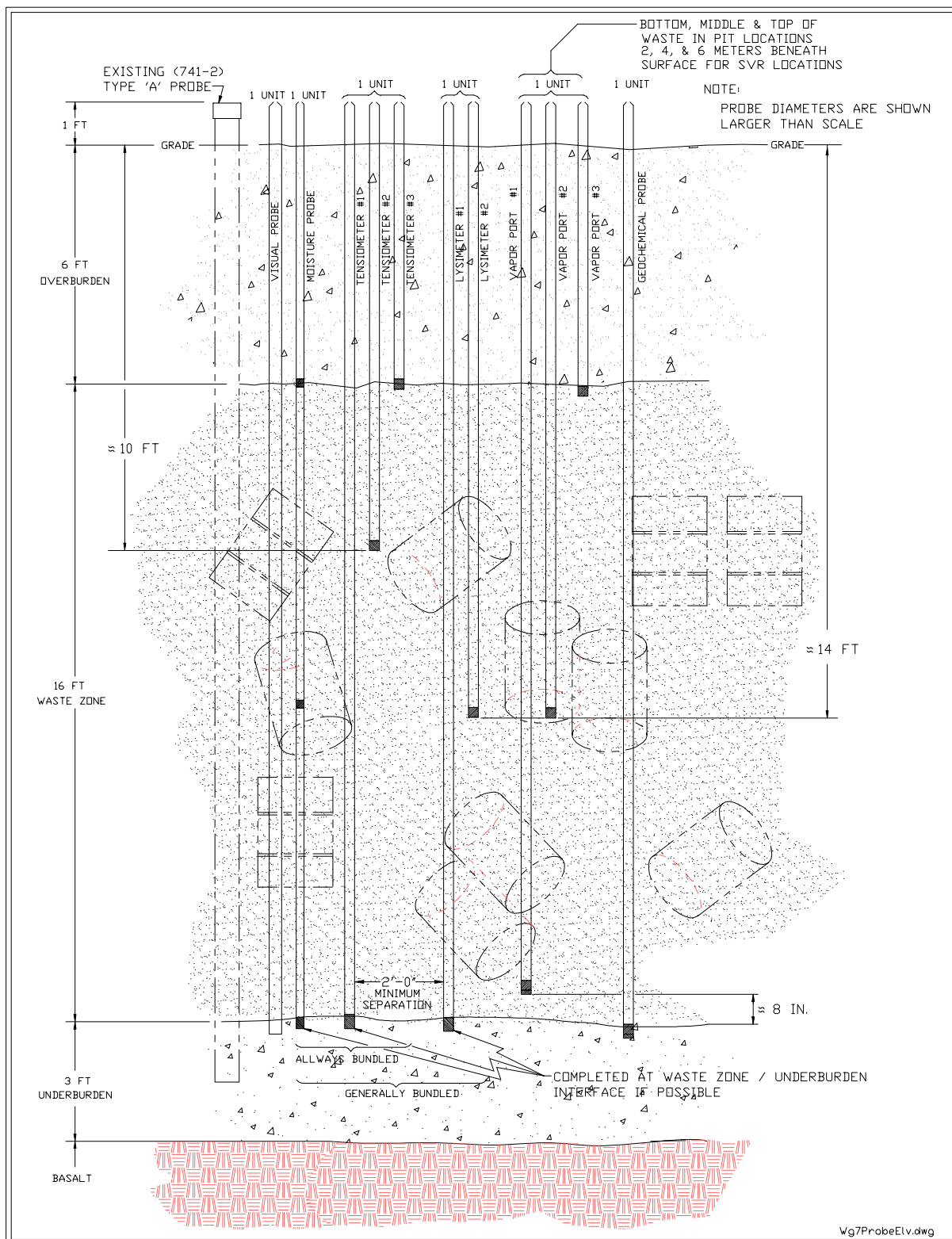


Figure 5. Cross-sectional view of typical Types A and B probe clusters in the Subsurface Disposal Area.

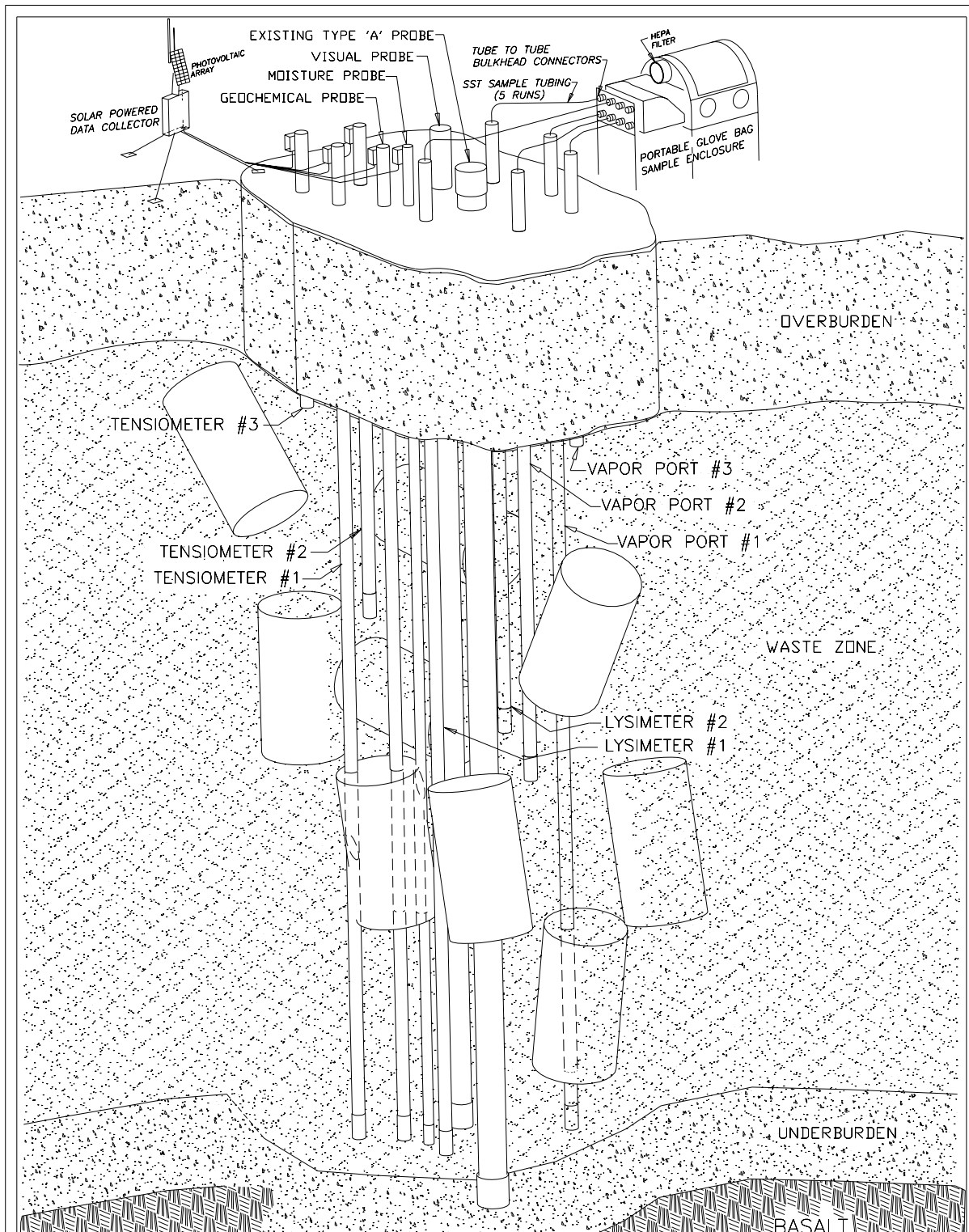


Figure 6. Isometric perspective of typical Types A and B probe clusters in the Subsurface Disposal Area.

3.2.1 Depleted Uranium Focus Area

Most uranium disposed of in the SDA is DU sent from the RFP. Most of the DU was roasted (i.e., oxidized to allow for the safe shipping and storage of the material) to eliminate the potential for a pyrophoric reaction. Review of the shipping records indicated that Pit 10 contains source areas to sample the roaster oxide form of DU, waste type RFO-DOW-16H. Of special interest are Disposals 5 and 15, located in the western portion of the pit (see Figure 7). This waste was among the first disposed of in Pit 10. Disposal 5 contained 153 drums of waste, of which 25 were the roaster oxide form of DU (i.e., oxidized uranium chips and turnings from machining operations). Disposal 15 contained 154 drums of waste, of which 20 drums contained roaster oxides.

This area was chosen for installation and logging of two phases of Type A probes. Factors influencing the selection of these disposals for Type A probehole placement and investigation are described in the Probehole Plan. Table 5 indicates the contents and disposal coordinates for Disposals 5 and 15, which were the target shipments during the Type A investigation and are still the targets for the Type B activities.

Interpreted results from the second phase of Type A probes are given in the letter report, *Summary of DU and 743 Study Area Logging Results through 2/5 w/Emphasis on New Logging Data Received on 1/29/01* found in Appendix D. The highest concentrations of uranium detected in the DU focus area were found at locations DU-10, DU-14 and DU-16. These and other candidate Type A probes from this focus area were subsequently directionally logged at targeted depth intervals in May 2001. Results summarized in the letter report, *Summary of DU and 741 Area Azimuthal Logging, Logging data through 5/23/01* (see Appendix D), indicate that the three locations discussed above are the optimal locations within the DU focus area around which to site Type B probes and collect data on DU characteristics in the SDA. In addition to the three areas described above, an excellent DU source was identified along the organic sludge focus area transect. The highest level of uranium logged in any Type A probe was found at probe cluster location 743-08. This probe was also selected as the origin of a probe cluster to characterize organic sludges and, as such, will serve for both DU and organic sludge characterization.

Finally, a fourth cluster identified in the DU focus area is being investigated because logging results indicated that it was an excellent site to monitor neptunium waste. This site (DU-8) is described in Section 3.2.7, under the americium and neptunium focus area. Letter reports describing the preliminary evaluation of Type A nuclear logging data to support selection of Type B probe cluster locations are given in Appendix D.

The following set of Type B instruments was planned for installation at the DU focus area to monitor uranium-bearing waste, although some of these probes are presently funding limited:

- Three tensiometer and moisture sensor bundles
- Four lysimeter bundles
- Three vapor port bundles
- One geochemical probe
- Three visual probes.

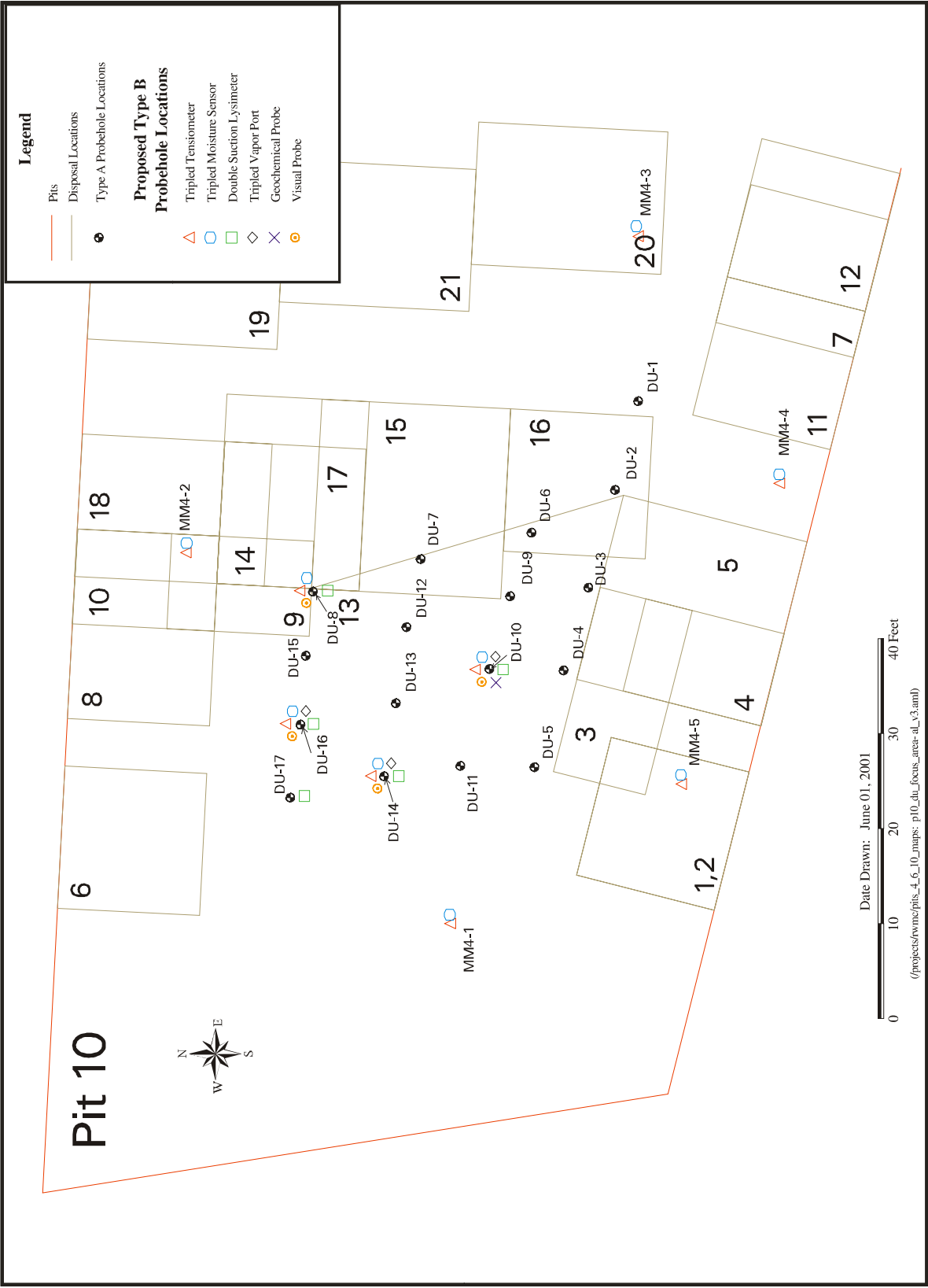


Figure 7. Proposed Type B probe clusters at the depleted uranium focus area.

Table 5. Contents of shipments evaluated for the depleted uranium focus area.

| Pit 10 Disposals | Location | Rocky Flats Generator | Description | INEEL Waste Stream Identification | Drum Weight (lb) | Disposal Date |
|------------------|--|-----------------------|--|-----------------------------------|------------------|---------------|
| 5 | 40 to 60 ft east and 0 to 20 ft north of S/W monument | 44 | 25 roaster oxide, 52 Type V | RFO-DOW-16H and 9/10H | 31,378 | 8/12/68 |
| | | 77 | 60 Type I, 16 Type V | RFO-DOW-4H, and 9/10H | 8,617 | 8/12/68 |
| 15 | 65 to 85 ft east and 25 to 45 ft south of N/W monument | 44 | 61 Type V, 20 roaster oxide, 2 BE, 71 Type I | RFO-DOW-9/10H, 16H, 31H, and 4H | 26,331 | 9/12/68 |

3.2.2 Organic Sludge Focus Area

Organic compounds buried in the SDA include CCl₄, methylene chloride, TCE, TCA, PCE, heavy lubricating oils, traces of polychlorinated biphenyls, chlorofluorocarbons, alcohols, organic acids, EDTA (ethylene-diaminetetraacetic acid, also known as versenes), and nitrobenzene. The primary contributors to potential risk in the Interim Risk Assessment from organic sludges were CCl₄, methylene chloride, and PCE. Carbon tetrachloride, 98% of which was originally contained in waste stream RFO-DOW-15H (also known as organic sludge or 743 Series sludge), dominates the present and near-term potential risk. Disposal records indicate that the east end of Pit 4 contains a large number of drums containing 743-series sludge. High VOC soil-gas concentrations have been detected over the east end of Pit 4, corroborating that drums containing 743-series sludge are buried there.

The primary purpose of the Type B investigation in Pit 4 is to continue the evaluation of organic sludge started during the Type A project. A combination of soil vapor probes (both shallow and within the waste), enhanced logging of the Type A probes, flux chamber measurements, and modeling will be used to refine the source mass remaining. During Type A probe activities, a large transect of nuclear logging probes (i.e., Type A probes) was installed in the eastern side of Pit 4. The area investigated contained a significant quantity of organic sludge, as evidenced by disposal records (INEEL 2000). Unlike the other two focus areas, disposal of organic sludge in the northeast end of Pit 4 was ubiquitous, so identification of precise Type B cluster installation locations was not considered critical. The three primary probe clusters selected were chosen to cover a large aerial extent of the transect and also to cover a range of chlorine detections from nuclear logging that, together with soil gas results and disposal information, are believed to be indicative of the presence of chlorinated solvent-containing source material. Appendix E contains the letter reports that summarize the interpretation of the nuclear logging data.

Location 743-3 was chosen to site Type B probes because it had the highest chlorine signature of any Type A probe along the transect and was located in an area known to contain organic sludge disposals, which were supported by soil-gas survey results. Location 743-08 was selected for much the same reason. In addition, this location contained the largest detection of U-238 daughter products. As a result, 743-08 may provide valuable information regarding DU characteristics, in addition to the data to be gained regarding organic sludges. Location 743-18 was selected because it is in the transition area between disposals which contain organic sludges and those which do not. Type A logging data indicated the presence of chlorine, but at substantially lower concentrations than identified at 743-3 and 743-8. The letter reports containing the preliminary evaluation of Type A nuclear logging data used to support selection of Type B probe clusters in this focus area are given in Appendix D. The following set of

Type B probes were planned for installation at the organic sludge focus area, although some of these probes are presently funding limited:

- Six tensiometer and moisture sensor bundles
- Four lysimeter bundles
- Five vapor port bundles
- Two geochemical probes
- Five visual probes.

Figure 8 indicates the approximate locations of the three currently funded probe clusters.

3.2.3 Americium and Neptunium Focus Area

The primary source of Am-241 and Np-237 in the SDA is the first stage wastewater sludge (i.e., the 741-series sludge) from Rocky Flats Environmental Technology Site. Pit 10 contains source areas to sample 741-series sludge (i.e., waste stream RFO-DOW-3H). Of special interest are waste Disposals 195, 196, 205, 206, and 207 that contained 741-series sludge. These disposals were investigated because they contain both relatively large numbers and high ratios of 741-series sludge compared to other waste streams in the respective shipments. Of the 301 drums in Disposals 195 and 196, 169 contained 741-series sludge. Of the 293 drums in disposals 205, 206, and 207, 137 contained 741-series sludge. Table 6 lists the contents of the five shipments.

The americium and neptunium focus area is being investigated to determine a fingerprint of this high-activity waste stream in the SDA environment. Both Am-241 and Np-237 showed potential risks greater than $1\text{E-}06$ in the Interim Risk Assessment. Most of the Np-237 is produced through the decay of Am-241. The primary waste stream for Am-241 is RFO-DOW-3H, which contains more than 80% of the Am-241 buried in the SDA and is primarily uncemented sludge. Disposal of this waste stream occurred from 1954 to 1970.

Prior to installation of the Type A probes, there was some uncertainty whether this waste stream could be located. Results of the Type A logging data indicate that the waste was encountered and logged during the Type A activities. Preliminary results of the Type A nuclear logging data are given in letter reports contained in Appendix D. Locations 741-2 and 741-8 had higher observed concentrations of Pu-239, Am-241, and neptunium than in other locations in this focus area. In addition, location DU-8 in the DU focus area contained an excellent source for monitoring neptunium waste.

At location 741-8, 8 ft (2.4 m) below ground surface (bgs), a high concentration of typical 741-bearing radionuclides (i.e., Plutonium [Pu], Am, Np) were found. A single narrow contamination zone with no other intermixed contamination was observed. The scientists evaluating the data set identified significant Np-237 enrichment relative to the amount expected from the decay of pure Am-241 (Mandler and Giles 2000). Significantly reduced contaminant concentrations were observed below the 8-ft (2.4-m) interval. This Type A probe will be the origin of a Type B cluster used to collect data on high-activity waste characteristics in the SDA. Directional logging data also provided a good basis for orienting the lysimeter planned to monitor the apparent source at this cluster.

Another candidate area was identified at location 741-2. At a depth of 11.5 ft (3.5 m) bgs, high concentrations of Pu, Am, and neptunium isotopes were also observed. Conditions in this probehole were similar to 741-8. Directional logging data also provided a good basis for orienting the lysimeter planned to monitor the apparent source at this cluster.

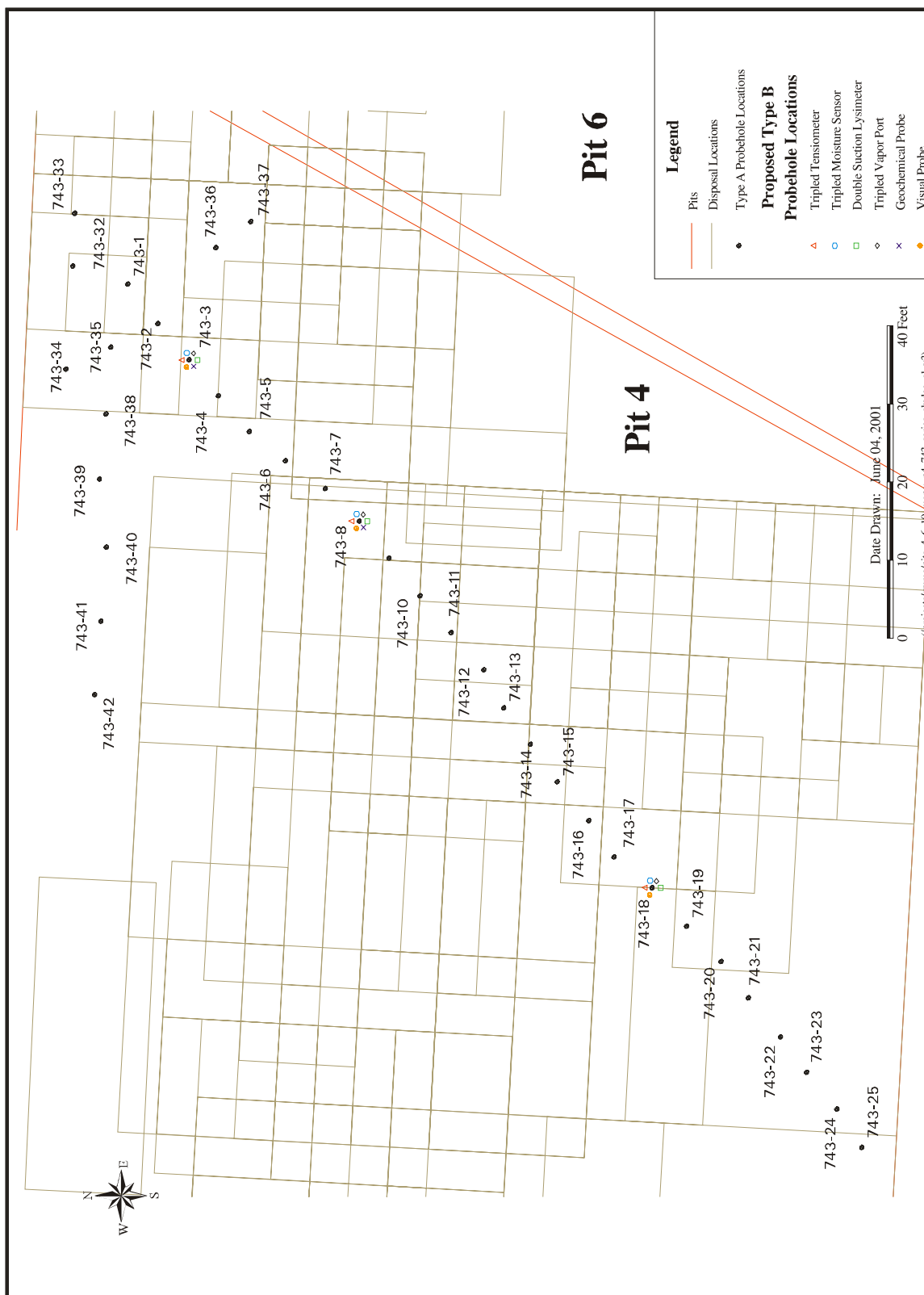


Figure 8. Proposed Type B probe clusters at the organic sludge focus area.

Table 6. Contents of shipments evaluated for the 741-series sludge focus area.

| Pit 10 Disposals | Location | Rocky Flats Plant Generator | Description | INEEL Waste Stream Identification | Drum Count | Drum Weight (lb) | Cont. Type | Disposal Date |
|------------------|---|-----------------------------|----------------------|-----------------------------------|------------|------------------|------------|---------------|
| 195 | 60 to 70 ft north and 120 ft east of S/W monument Note: reference to S/W monument is presumed incorrect and should be S/W-2 (INEEL 2000) | 741 | Type IV | RFO DOW 3H, 41H, 42H | 103 | 30,508 | 30 gal | 6/3/69 |
| | | 771 | 21 Type V, 26 Type I | RFO DOW 9/10H, 4H, 41H | 47 | 6,095 | 55 gal | 6/3/69 |
| | | 559 | Type I | RFO DOW 4H, 41H | 6 | 750 | 55 gal | 6/3/69 |
| | | 776 | Type I | RFO DOW 4H, 41H | 13 | 1,536 | 55 gal | 6/3/69 |
| 196 | 50 to 80 ft north and 120 ft east of S/W monument Note: reference to S/W monument is presumed incorrect and should be S/W-2 (INEEL 2000) | 741 | Type IV | RFO DOW 3H, 41H, 42H | 66 | 33,395 | 55 gal | 6/5/69 |
| | | 771 | 16 Type V, 46 Type I | RFO DOW 9/10H, 4H, 41H | 62 | 7,303 | 55 gal | 6/5/69 |
| | | 776 | Type I | RFO DOW 4H, 41H | 2 | 264 | 55 gal | 6/5/69 |
| | | 559 | Type I | RFO DOW 4H, 41H | 2 | 219 | 55 gal | 6/5/69 |
| 205 | 70 to 80 ft south and 415 to 430 ft east of N/W monument | 741 | Type IV | RFO DOW 3H, 41H, 42H | 52 | 15,255 | 30 gal | 6/18/69 |
| | | 776 | Type I and V | RFO DOW 4H, 9/10H, 41H | 2 | 263 | 30 gal | 6/18/69 |
| | | 771 | Type I and V | RFO DOW 4H, 9/10H, 41H | 50 | 3,948 | 30 gal | 6/18/69 |
| 206 | 80 to 90 ft south and 415 to 430 ft east of N/W monument | 741 | Type IV | RFO DOW 3H, 41H, 42H | 52 | 15,586 | 30 gal | 6/18/69 |
| | | 771 | Type I and V | RFO DOW 4H, 9/10H, 41H | 52 | 4,481 | 30 gal | 6/18/69 |
| 207 | 60 to 70 ft south and 415 to 430 ft east of N/W monument | 741 | Type IV | RFO DOW 3H, 41H, 42H | 33 | 16,414 | 55 gal | 6/18/69 |
| | | 771 | Type I and V | RFO DOW 4H, 9/10H, 41H | 52 | 4,541 | 30 gal | 6/18/69 |

The final Type A probe, used to center Type B probes to study americium and neptunium waste, was actually identified in the DU focus area. Type A logging data summarized in Appendix D indicated that the highest concentration of Np-bearing waste was detected at DU-8 and, as such, DU-8 was determined to be an excellent candidate site to monitor waste of this type. The lysimeter planned to monitor this material will be placed at approximately 14.5 ft (4.4 m) bgs, the depth where the highest neptunium waste was encountered. The probes planned for DU-8 are shown in Figure 7, which represents the DU focus area.

Table 9 summarizes the Type B probes and recommended lysimeter placement for targeted lysimeters being installed at the selected cluster locations. Completion of other probes in these clusters will be consistent with the generic approach described in Section 2. Figures 7 and 9 indicate the approximate locations of the three currently funded probe clusters used to characterize americium and neptunium waste. The following set of Type B probes was planned to be installed as part of the americium and neptunium investigation, although some of these probes are presently funding limited:

- Three tensiometer and moisture sensor bundles
- Four lysimeter bundles
- One geochemical probe
- Three visual probes.

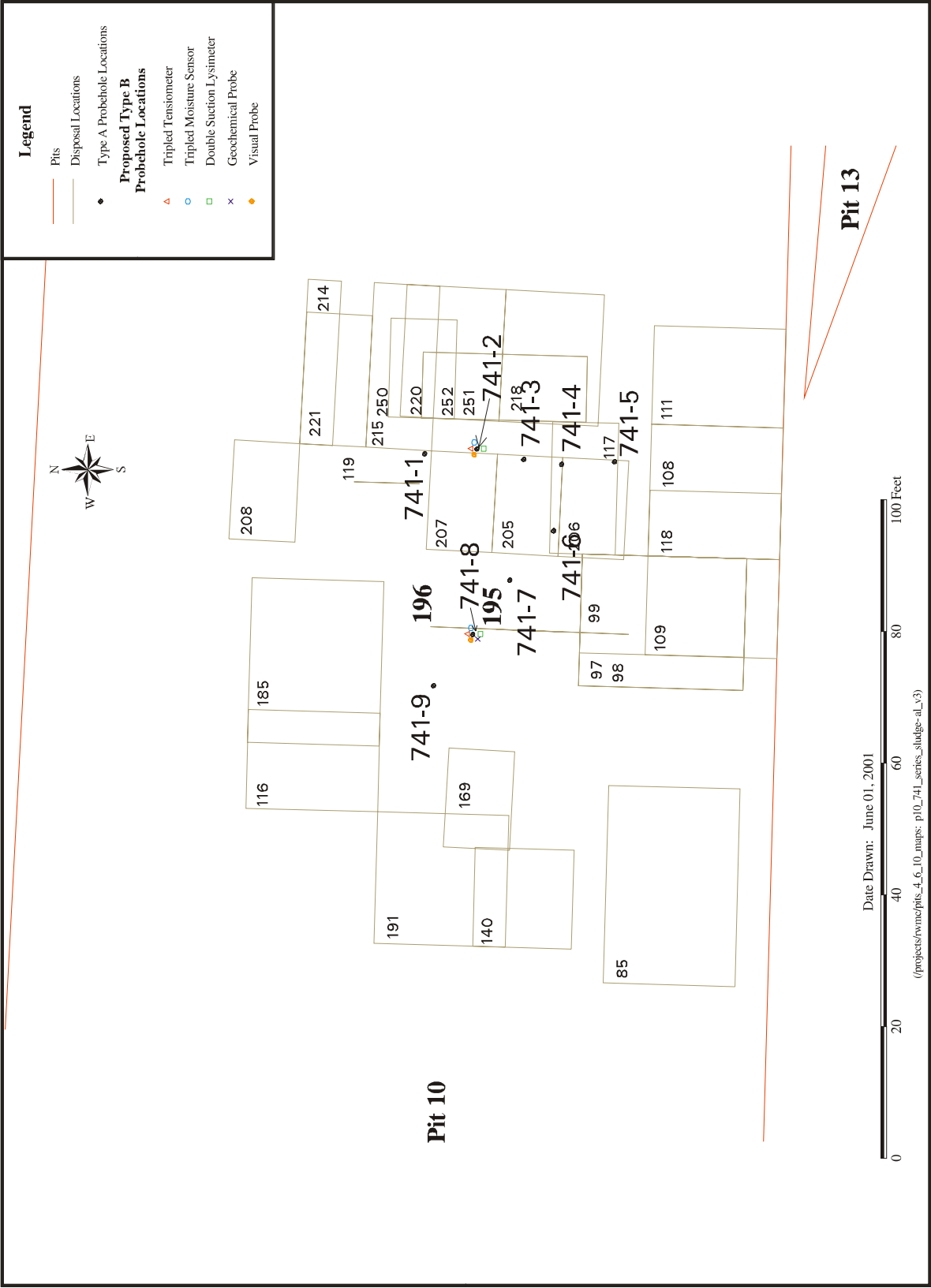


Figure 9. Proposed probe clusters at the americium and neptunium focus area.

3.2.4 Pit 5 Investigation

The main purpose for investigations within Pit 5 is to attempt to identify the source of anthropogenic uranium detected in a lysimeter in Well TW-1, completed approximately 102 ft (31 m) bgs.^f Uranium detected in this well was enriched in U-235 composition relative to natural or DU. It also contained U-236, a manmade radioisotope. Another purpose of the investigation is to identify VOC source material within the pit. Disposal records for organic sludge, as well as the limited calendar year (CY) 2000 soil-gas survey described in the Probehole Plan, will also be used to site probe-installation locations. Two areas will be investigated using Type B probes within Pit 5 for this purpose.

Final selection of the Type B locations will also be based on the results of initial Type A probe logging planned for installation, and logging to be completed by the summer of 2001. Five Pit 5 disposals (described below) were targeted for Type A probe installation and logging to identify additional sources of nondepleted uranium disposed in Pit 5. Table 7 provides information on these targeted disposals.

Bulk uranium was handled at the following primary facilities at Rocky Flats Environmental Technology Site:

- Building 444: Building 444 was a multipurpose manufacturing facility with an emphasis on manufacturing DU and beryllium components. Parts were cast, fabricated, assembled, and inspected in the facility.
- Building 881: Building 881 focused on enriched uranium manufacturing and recovery through the mid 1960s. Building 881 was also involved in numerous special projects, including work on U-233.
- Building 883: Building 883 was used to assist with fabrication of enriched and DU parts used in weapon production.
- Building 886: Building 886 was primarily used to conduct criticality tests on highly enriched uranyl nitrate.

The justification for selecting Pit 5 disposals for the initial Type A investigation is given below. Limited information exists that describes the contents of the disposals. In addition, disposal location information within the pit can only be considered approximate. Furthermore, waste of interest within a disposal was typically a minority of the total waste types within the disposal. Depleted uranium disposals have already been identified and logged as part of the initial Type A investigation, which was primarily focused in the western portion of Pit 10. Therefore, primary DU generators (i.e., Buildings 444 and 883) were not considered targets for this evaluation, although it is recognized that disposal originating from Building 883 could contain enriched uranium. Thirty Type A probes are planned to be installed and logged to support evaluation of an appropriate site for subsequent Type B cluster installation. The 30 Type A probes will be established in the following four general areas (see Figure 10).

3.2.4.1 Pit 5-1. An area identified as Pit 5-1 was targeted to place Type A probes because it contains what appears to be two collocated disposals of U-233 containing waste from Building 881. Thirty-nine of the 370 drums contained in these two disposals contained U-233 drums from Building 881. Another three drums from these two disposals were reported to contain U-233 from Building 771. Another important consideration in selecting this site for investigation was its disposal location along the southern perimeter of Pit 5. Disposal location information near the pit boundary is assumed to be more accurate than information near the center of a large pit like Pit 5.

f. Roback, C., D. W. Efur, M. T. Murrell, and R. E. Steiner, July 20, 2000, "Assessment of U and Pu in the Saturated and Unsaturated Zones Beneath the Surface Disposal Area, INEEL (Draft)," Los Alamos National Laboratory, Los Alamos, New Mexico.

Table 7. Pit 5 targeted waste shipment for installation of Type A probes.

| Targeted Location | Rocky Flats Generator | Type | INEEL Waste Stream Identification | Location | Number of Containers | Weight of Containers (lb) | Total Volume (ft ³) | Document Identification Number | Disposal Date | Surface Radiation (mR/hour) |
|-------------------|-----------------------|-------------------|------------------------------------|---|----------------------|---------------------------|---------------------------------|--------------------------------|---------------|-----------------------------|
| Pit 5-1 | 881 | U-233 | RFO-DOW-19H | 100 ft west of S/E monument | 10 (55-gal) | 2,321 | 74 | RFODOWSR105/22/65 80010 | 5/26/65 | 1 |
| Pit 5-1 | 881 | U-233 | RFO-DOW-19H | 100 ft west of S/E monument | 29 (55-gal) | 3,482 | 213 | RFODOWSR105/22/65 81010 | 5/26/65 | 1 |
| Pit 5-2 | 881 | Type I and Type V | RFO-DOW-18H-V, 11H-V, 6H-III, 4H-I | 190 ft north and 25 ft east of the SW monument | 6 (55-gal) | 790 | 44 | RFODOWSR109/16/66 81020 | 9/23/66 | 1.5 |
| Pit 5-3 | 881 | Type I | RFO-DOW-4H | 60 ft east and 125 ft north of the SW monument | 42 (55-gal) | 4,691 | 309 | RFODOWSR104/29/66 80070 | 5/6/66 | 7 |
| Pit 5-4 | 886 | Type I and Type V | RFO-DOW-4H, 9/10H | 50 ft east and 175 ft north of the S/W monument | 14 (55-gal) | 1,428 | 103 | RFODOWSR108/12/66 81020 | 8/19/66 | 2 |

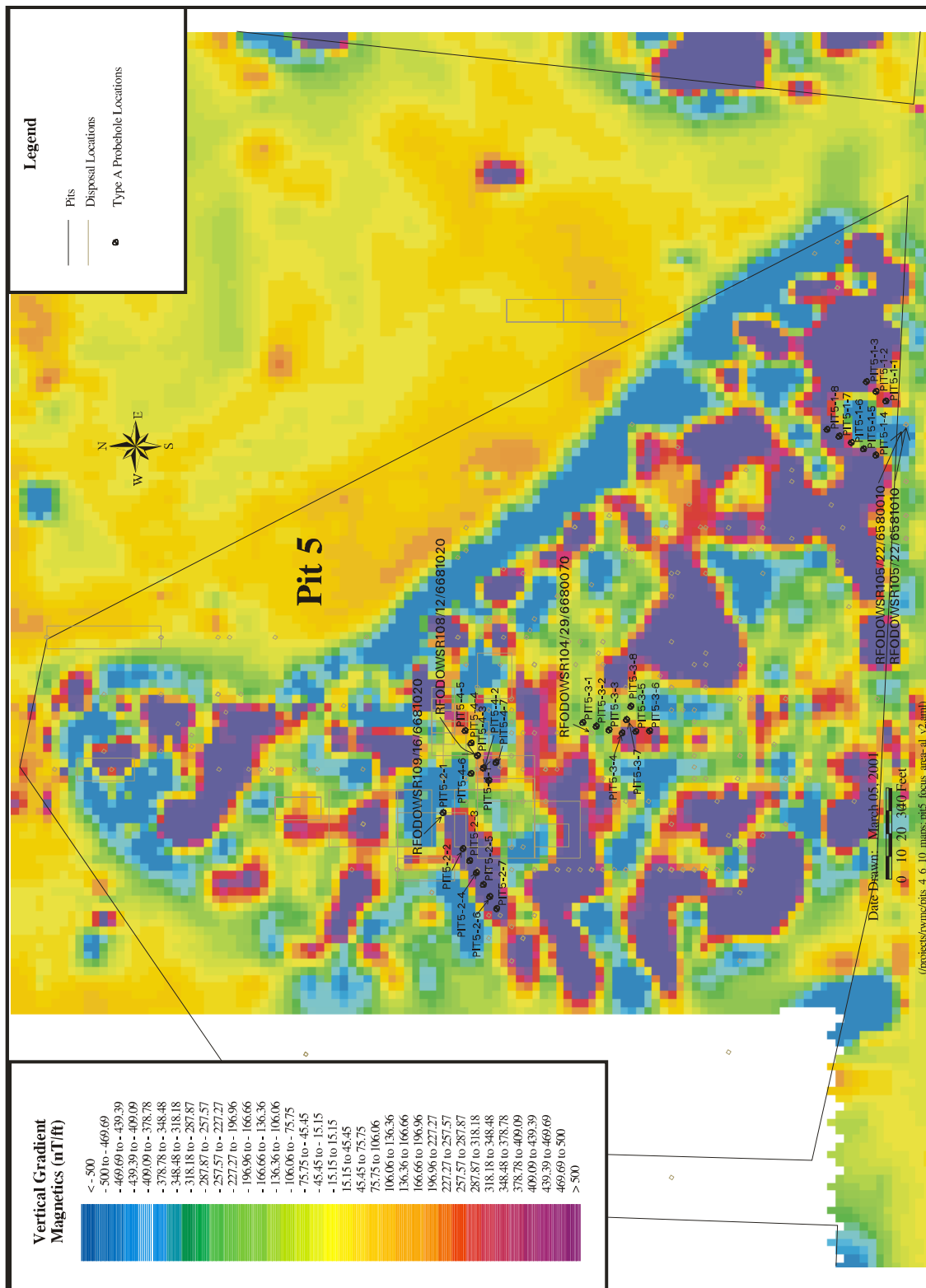


Figure 10. Proposed Type A probehole locations in Pit 5.

3.2.4.2 Pit 5-2. An area identified as Pit 5-2 was targeted because it was the only Pit 5 location known to contain waste type 18H (i.e., enriched uranium), and drums within the disposal contained elevated surface radiation dose rates of 1.5 mR/hour. Six of the 150 drums within this disposal originated from Building 881 and may contain enriched uranium waste, including crucibles and high-efficiency particulate air (HEPA) filters. Five of the drums in this shipment also contained waste originating in Building 444, some of which contained DU. Disposals containing both enriched uranium and DU waste types may be a negative attribute because this could complicate logging interpretation if the drums were collocated. However, the fact that enriched uranium was identified in the disposal records outweighed this consideration.

3.2.4.3 Pit 5-3. An area identified as Pit 5-3 was targeted to place Type A probes because 42 of the 152 drums in the disposals originated from Building 881 and were described as combustibles in the form of rags and paper. In addition, three additional drums within the shipment contained U-233 waste. Drums within the disposal also contained some of the highest surface radiation dose rates (7 mR/hour).

3.2.4.4 Pit 5-4. An area identified as Pit 5-4 was targeted for placement of Type A probes because 14 of the 147 drums in this disposal originated from Building 886, a building established to perform criticality testing on highly enriched uranyl nitrate. All but 16 of the drums in this disposal originated from uranium processing facilities (i.e., Building 881, 883, or 886), making uranium detection likely. However, as stated before, Building 883 waste could contain DU, thereby complicating analysis. In an informal telecommunication with H. Salomon,^g J. Anderson indicated that two enriched uranium-contaminated glove boxes and associated piping were disposed of many years ago (timeframe unknown).

Information concerning this disposal indicates that these waste areas contain glove box decontamination, dismantlement, and decommissioning-type waste and combustibles, which would be expected from cleanups or decontamination operations. This material could be expected to contain higher concentrations of enriched uranium. Anderson also noted that numerous spills in Building 886 (e.g., highly enriched uranyl nitrate) were often mopped up. If disposed of, these mops (i.e., combustibles) would contain significant U-235 activity. Once the Type A investigation is completed at Pit 5, the following set of Type B instruments are expected to be located for installation:

- Two tensiometer and moisture sensor bundles
- Two lysimeter bundles
- Two vapor port bundles
- Two geochemical probes
- One visual probe.

3.2.5 Pit 6 Investigation

Three bundles of vapor ports and one visual probe will be installed in Pit 6 (see Figure 11). In accordance with the Probehole Plan, a combination of CY 2000 shallow soil gas surveys and 743-series sludge disposal information was used to site the locations. The following three disposals were targeted for investigation:

^g J. Anderson, radiological engineer and current Building 886 facility manager, telecommunication with H. Salomon, November 26, 2001.

- Disposal RFODOWSR109/22/67800 contained 129 drums, of which 35 were identified to contain 743-series sludge. This disposal was located in the northwestern corner of Pit 6 and had the highest concentration of CCl_4 identified in Pit 6 during the CY 2000 shallow soil-gas survey. A vapor port bundle and visual probe will be installed where this disposal was described to have been disposed. This location will be identified as Pit 6-1.
- Disposal RFODOWSR105/03/68800 contained 76 drums, of which 59 were identified to contain 743-series sludge. This disposal was located in the north-central portion of Pit 6 and also contained elevated concentrations of CCl_4 identified during the CY 2000 shallow soil-gas survey. A vapor port bundle will be installed here and the location will be identified as Pit 6-2.
- Disposal RFODOWSR110/19/67800 contained 152 drums, of which 35 were identified to contain 743-series sludge. This disposal was located in the southeastern portion of Pit 6 and also contained elevated concentrations of CCl_4 identified during the CY 2000 shallow soil-gas survey. A vapor port bundle will be installed here and the location will be identified as Pit 6-3.

Figure 11 contains the locations of the three targeted waste zones and proposed probehole locations superimposed over the results of the CY 2000 shallow soil-gas survey.

3.2.6 Moisture Monitoring Network

In addition to the investigations in Pits 4 and 10 to evaluate the various focus areas, tensiometer and soil moisture sensor probe bundles will be placed in additional locations in and adjacent to the pits to evaluate infiltration characteristics caused by standing water and snow melt in ditches. Three north-to-south trending transects, each made up of three tensiometers and moisture-sensor bundles, will be established in and adjacent to Pit 4 (see Figure 3). These bundles should be arranged such that the nested probes in each bundle form a line that is essentially parallel to the ditch on the north side of Pit 4. Nested probes are considered to represent the same horizontal position, yet completed (i.e., installed) to represent different vertical positions. The MM1 tensiometer transect is located to monitor the effect of water that flows through a culvert under the east-west road. The MM2 transect is centrally located along the northern edge of Pit 4 and is located in a slight topographic depression (especially MM2-3). The MM3 transect is located just east of the I-3 monitoring well pair which showed wet conditions above the BC interbed at a depth of ~90 ft (27 m).

Another five tensiometer and moisture-sensor bundles (i.e., the MM4 network) will be installed to form an array around the DU focus area to evaluate infiltration characteristics in that area. Some of these probes will be located in an area believed to contain a topographic depression on the underlying basalt surface. Several of the probes in this location are located along the drainage ditch that borders the southwest corner of Pit 10. Probes MM4-2 and MM4-3 have been located in areas that have high surface elevations with good surface water runoff. These locations are specifically biased toward areas of suspected low infiltration to monitor moisture behavior in areas with less favorable infiltration potential.

3.2.7 Activated Metal (Stainless Steel) Investigation at Soil Vault Row 12

Carbon-14 is an activation product and hence a byproduct of reactor operations. There is uncertainty about the amount of C-14 disposed of in the SDA and the release rate of the disposed C-14. The release rate for C-14 is believed to be controlled by the type of base metal in which it was formed (e.g., activated stainless steel or activated beryllium). There is an ongoing effort to refine the inventory of C-14 in the SDA. Using the current assumptions on release rate, preliminary evaluations of the potential risks from the Interim Risk Assessment indicate that C-14 may still be above acceptable risk levels.

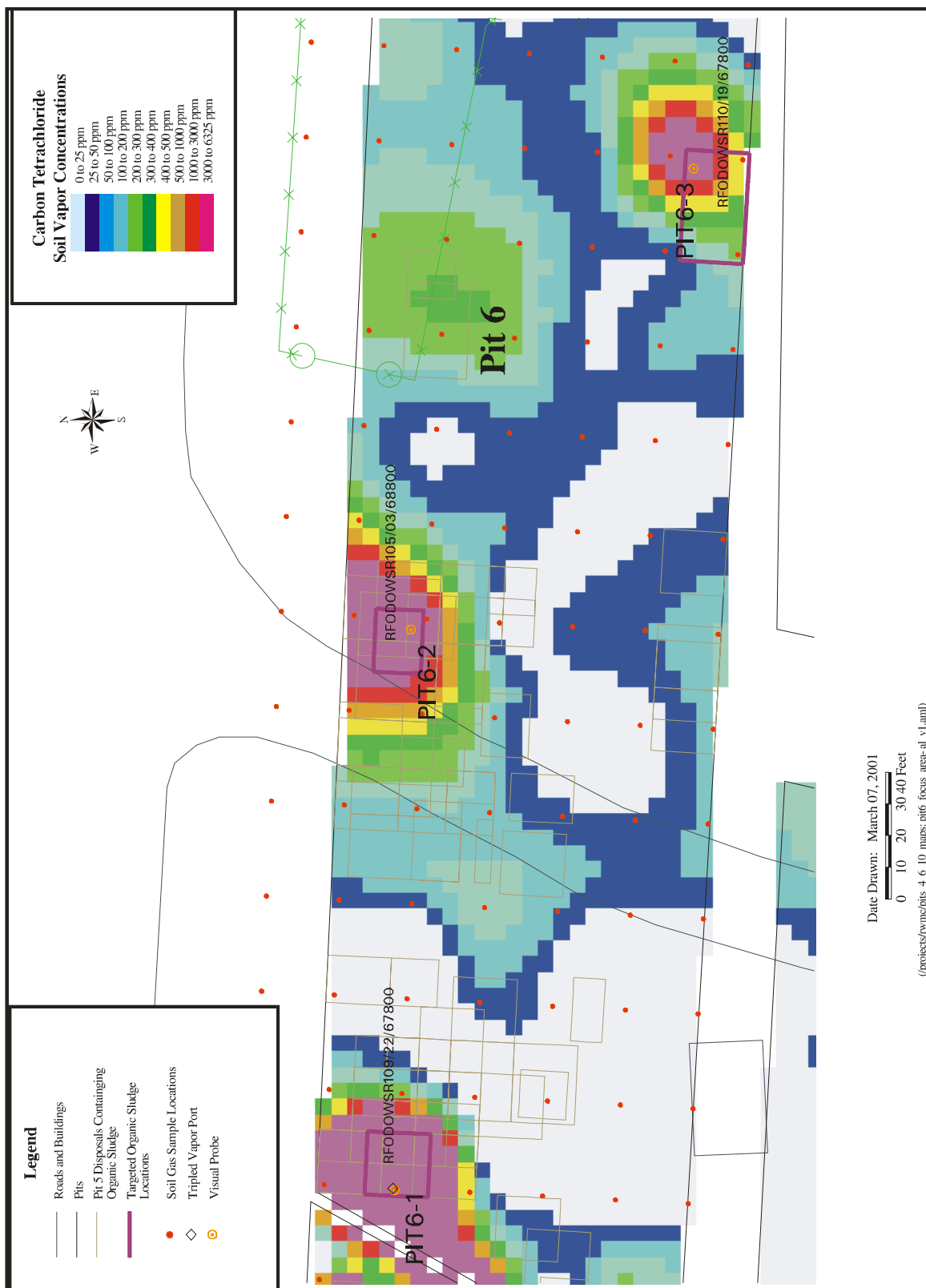


Figure 11. Proposed Type B probehole locations in Pit 6.

Most of the C-14 inventory in the SDA is from disposal of activated metal. Some of this is in the form of reactor core components, including beryllium reflector blocks and end pieces from naval reactor cores. The remaining activity is mostly in ion exchange resins. Because of how the C-14 is generated, it is contained in high-activity waste. As such, it is disposed of in locations separate from the other contaminants discussed. Typical disposals were in the SVRs, or possibly trenches, in the earlier years of operation. Carbon-14 can be transported in both the vapor and dissolved phases. It is anticipated that Type B probes near the appropriate soil vaults can yield information regarding the release and potential transport of C-14 in the subsurface. Moisture monitoring will also be conducted near the vault because the moisture state of the surrounding soil affects the sampling and evaluation of soil gas data.

Two activated metal disposal sites will be evaluated during this investigation. This section describes the evaluation for activated stainless steel while the following section describes additional monitoring at a site in which activated beryllium has been disposed of.

Objectives of choosing an optimal soil vault location to monitor activated stainless include the following:

- Locating highly activated stainless steel.
- The location can contain no activated beryllium in or near the soil vault of interest. This is done to mitigate overestimation of C-14 release, because beryllium is known to release this isotope at significantly greater rates than stainless steel. Some of the TRA Advanced Test Reactor core material contains activated beryllium (Logan 1999), which is the focus of other probes described in the following section.
- Sites containing only activated zircaloy should also be avoided. Some Naval Reactors Facility disposals contain zircaloy. If a site containing no activated stainless steel (e.g., just containing activated zircaloy) was mistakenly sampled, erroneously low concentrations of activation products would be expected.
- Monitored material must have direct contact with soil (i.e., activated metal must be open to the environment). Typical scrap casks used to dispose of some of the Naval Reactors Facility activated end pieces from naval cores are believed to be completely sealed. In this configuration, activated metal would not leach until the cask itself deteriorated.
- Older material improves the chance of collecting contaminants of interest in leachate, providing the disposal records are adequate.

Soil Vault Row 12 contains numerous disposals of what is believed to be activated stainless steel. Information gathered through conversations with past and present INEEL personnel indicate that these disposals are probably stainless steel end pieces from spent Experimental Breeder Reactor II fuel elements and are highly irradiated. Spent fuel elements from Experimental Breeder Reactor II were sent to the Idaho Nuclear Technology and Engineering Center (INTEC), previously called the Idaho Chemical Processing Plant (ICPP), for processing after use. The stainless steel end pieces were physically separated from the fuel in underwater basins at CPP-603 before disposal at RWMC. This material is also expected to contain no beryllium. Discussion with personnel familiar with the subject disposals indicate that the material was disposed of in scrap cask inserts that were both open at the top and perforated on the bottom. The perforations were designed to allow draining once removed from the storage basin at CPP-603.

In a conversation with RWMC operations personnel,^h it was indicated that because of shallow soil conditions at SVR-12, these disposals were not made in the typical fashion of placing waste in an auger

h. James B. Bishoff, RWMC Operations, telecommunication with Hopi Salomon, May 17, 2001.

hole, as routinely done at RWMC soil vaults. Rather, a shallow hole was made with conventional excavation equipment and the scrap cask inserts were placed in the excavation, using a free air transfer technique. This was done remotely because the disposed waste had a very high radiation field associated with it. As a result, exact positioning of the disposed waste was not possible.

It was also noted the basalt surface in that area was no deeper than 8 to 12 ft (2 to 4 m) bgs at the time of disposal. However, because of subsequent flooding, RWMC operations placed approximately 10 ft (3 m) of fill in an area close to where these shipments were disposed. Ten disposals, originating from CPP-603, were placed in SVR-12 and are all thought to have been activated stainless steel. Table 8 provides information from the WasteOScope database, which is an INEEL ArcInfo application for these disposals. These CPP-603 activated stainless steel disposals were all made between May and July 1982. Information in the WasteOScope database, other than disposal position and disposal date, is consistent between all 10 disposals.

Geophysical surveys, along with available disposal information, were evaluated to determine optimal placement of Type B probes to monitor this activated stainless steel. This evaluation, including planned placement of probes, is detailed in Appendix E.

The investigation at SVR-12 will include installation of the following instruments:

- One tensiometer and moisture sensor bundle
- One lysimeter bundle
- Up to three vapor port bundles
- One geochemical probe.

It is critical that the lysimeter bundle installed at this site be located as close as possible to the waste disposal. Nonvolatile radionuclides released from the activated stainless steel are not expected to be released at significant rates or at high concentrations. Therefore, locating this lysimeter bundle within 1 to 2 ft (0.3 to 0.6 m) from the waste disposal is critical for meaningful samples to be collected here. For a potential cost-saving measure, installation of only one bundle of vapor ports (e.g., the bundle to be installed closest to the source) may be considered until analytical data demonstrate that the identified source is releasing contaminants.

3.2.8 Activated Metal (Beryllium) Investigation at Soil Vault Row 20

Six neutron-activated beryllium reflector blocks from the INEEL Advanced Test Reactor were buried in SVR-20 in 1993. The blocks contained 293,000 Ci of tritiated hydrogen gas and 32 Ci of C-14 (LMITCO 1999). These radionuclides form compounds that are mobile in both the liquid and gas phases of the vadose zone. Conservative assumptions used in the Interim Risk Assessment identified C-14 as the primary contributor to potential risk from sources of activated metal waste buried in the SDA. In addition to the results of the Interim Risk Assessment, C-14 was identified as a dose contributor in the RWMC performance (Case et al. 2000).

Samples collected from this site will be analyzed for both C-14 and H-3 to evaluate the validity of the assumptions used in the Interim Risk Assessment. Tritium, though not a contaminant of potential concern, is being analyzed because it is easier to measure, and it reflects the corrosion of the blocks and release of C-14 and other radionuclides. In addition, tritium is not expected to attenuate during transport, while C-14 could react with the surrounding media. Therefore, though C-14 is more important from a risk perspective, monitoring for tritium will provide valuable data because it is expected to offer more direct information regarding release characteristics from the source.

Table 8. Information from the WasteOScope database about possible activated stainless steel disposal at Soil Vault Row 12.

| Disposal Location | Generating Area | Shipment Number | Disposal Date | Container Type | Number of Containers | Gross Volume (m ³) | Gross Weight (g) | Activity (Ci) | Nuclide Identification | Curies |
|-------------------|-----------------|-----------------|---------------|----------------|----------------------|--------------------------------|------------------|---------------|------------------------|--------|
| SVR120+10 | CPP-603 | NCMP ICP82-254 | 5-May-82 | I | 1 | 0.8213 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |
| SVR120+10 | CPP-603 | NCMP ICP82-293 | 20-May-82 | I | 1 | 0.8213 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |
| SVR120+20 | CPP-603 | NCMP ICP82-327 | 2-Jun-82 | I | 1 | 0.8213 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |
| SVR120+55 | CPP-603 | NCMP ICP82-357 | 21-Jun-82 | I | 1 | 0.8213 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |
| SVR120+55 | CPP-603 | NCMP ICP82-372 | 30-Jun-82 | I | 1 | 0.8213 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |
| SVR120+65 | CPP-603 | NCMP ICP82-388 | 30-Jun-82 | I | 1 | 0.8213 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |

Table 8. (continued).

| Disposal Location | Generating Area | Shipment Number | Disposal Date | Container Type | Number of Containers | Gross Volume (m ³) | Gross Weight (g) | Activity (Ci) | Nuclide Identification | Curies |
|-------------------|-----------------|-----------------|---------------|----------------|----------------------|--------------------------------|------------------|---------------|------------------------|--------|
| SVR120+75 | CPP-603 | NCMP ICP82-406 | 8-Jul-82 | I | 1 | 0.8212 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Co-60 | 140 |
| | | | | | | | | | Cr-51 | 420 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 5,460 |
| SVR120+85 | CPP-603 | NCMP ICP82-420 | 13-Jul-82 | I | 1 | 0.8212 | 544,300 | 14,000 | Co-58 | 7,840 |
| | | | | | | | | | Fe-59 | 140 |
| | | | | | | | | | Mn-54 | 420 |
| | | | | | | | | | Co-58 | 140 |
| | | | | | | | | | Co-60 | 5,460 |
| SVR121+22 | CPP-603 | NCMP ICP82-423 | 21-Jul-82 | I | 1 | 0.8212 | 544,300 | 1,400 | Co-58 | 784 |
| | | | | | | | | | Co-60 | 14 |
| | | | | | | | | | Cr-51 | 42 |
| | | | | | | | | | Fe-59 | 14 |
| | | | | | | | | | Mn-54 | 546 |
| SVR121+32 | CPP-603 | NCMP ICP82-448 | 28-Jul-82 | I | 1 | 0.8212 | 544,300 | 1,400 | Co-58 | 784 |
| | | | | | | | | | Co-60 | 14 |
| | | | | | | | | | Cr-51 | 42 |
| | | | | | | | | | Fe-59 | 14 |
| | | | | | | | | | Mn-54 | 546 |

A minimal monitoring network of one neutron access tube, three nested gas ports, two nested lysimeters, and two thermistors already exist around SVR-20, 0 + 315 ft (0 + 96 m). The monitoring conducted under this section will be used to augment the monitoring that began in 1994. The main addition is the installation of a radial array of bundled vapor ports to enhance monitoring tritium and C-14. Moisture monitoring will also be conducted near the vault because the moisture state of the surrounding soil affects the sampling and evaluation of soil gas data. The investigation at SVR-20 will include installation and monitoring of the following instruments:

- One tensiometer and moisture sensor bundle
- Five vapor port bundles
- One geochemical probe.

Figure 12 depicts the approximate locations proposed for installation of the nested probe bundles. Vapor port bundles should be completed at approximately 7, 13, and 19 ft (2, 4, and 6 m) below land surface. Vapor ports should be oriented so that the individual probe in each bundle of nested probes is placed at approximately the same radial distance from the original SVR auger hole being monitored. In addition, the three sensors in the soil moisture probe should be assembled so that the vertical placement of each sensor corresponds with the same (as close as possible) vertical horizon used for completion of the vapor ports, so that temperature measurements made by the soil moisture probe sensors can be used to assume temperatures of the soil gas being collected in each “nested” vapor port.

3.3 Summary of Probehole Cluster Groupings, Naming Convention, and Preferred Installation Sequence

3.3.1 Probe Naming

Table 9 lists the probes planned for the Type B investigation. If additional probes are placed, the naming conventions described below should be used, if practical. Probes placed during the Type B investigation start off with the following root name: “RWMC-SCI-S-.” The “RWMC” refers to the facility location, the “SCI” refers to the probes as scientific instruments, and the “S” refers to the Type B probes installed in the shallow surface soils (i.e., above the first basalt). The remainder of the individual probe names is given in Table 9. It is expected that the abbreviated name given in Table 6 will be noted in the logbooks used to record activities associated with the Type B probe installation and subsequent sampling. Where vertical placement of a sampling port (i.e., the porous steel of a lysimeter) is recommended based on Type A logging results, the vertical placement is given following the probe name. This is indicated by a footage in parentheses (e.g., [9.5 ft]), following the probe name.

The first part of the site-specific name, prior to the first dash, refers to the focus area, moisture-monitoring network, or general pit number (e.g., DU, MM4, Pit 6). The second part of the name contains up to two digits and refers to the original Type A probe around which the cluster of Type B probes is centered, or is a sequential number for the area in cases where Type B probes are not being placed around original Type A probes (e.g., at the moisture monitoring networks, the SVRs, Pit 5, and Pit 6). The last part of the name is one or two characters referring to probe type and, in cases where multiple probes of the same type are bundled (i.e., nested), is followed by a single digit indicating the vertical placement of the probe. Note that for the soil moisture probes, this code (which refers to vertical placement) is not given in the table. In situations where the tripled soil moisture probe is not used and two probes are used in lieu of one, a digit will be used indicating whether the probe is the deep or shallow probe. Table 10 contains the key that defines the last part of the probe name.

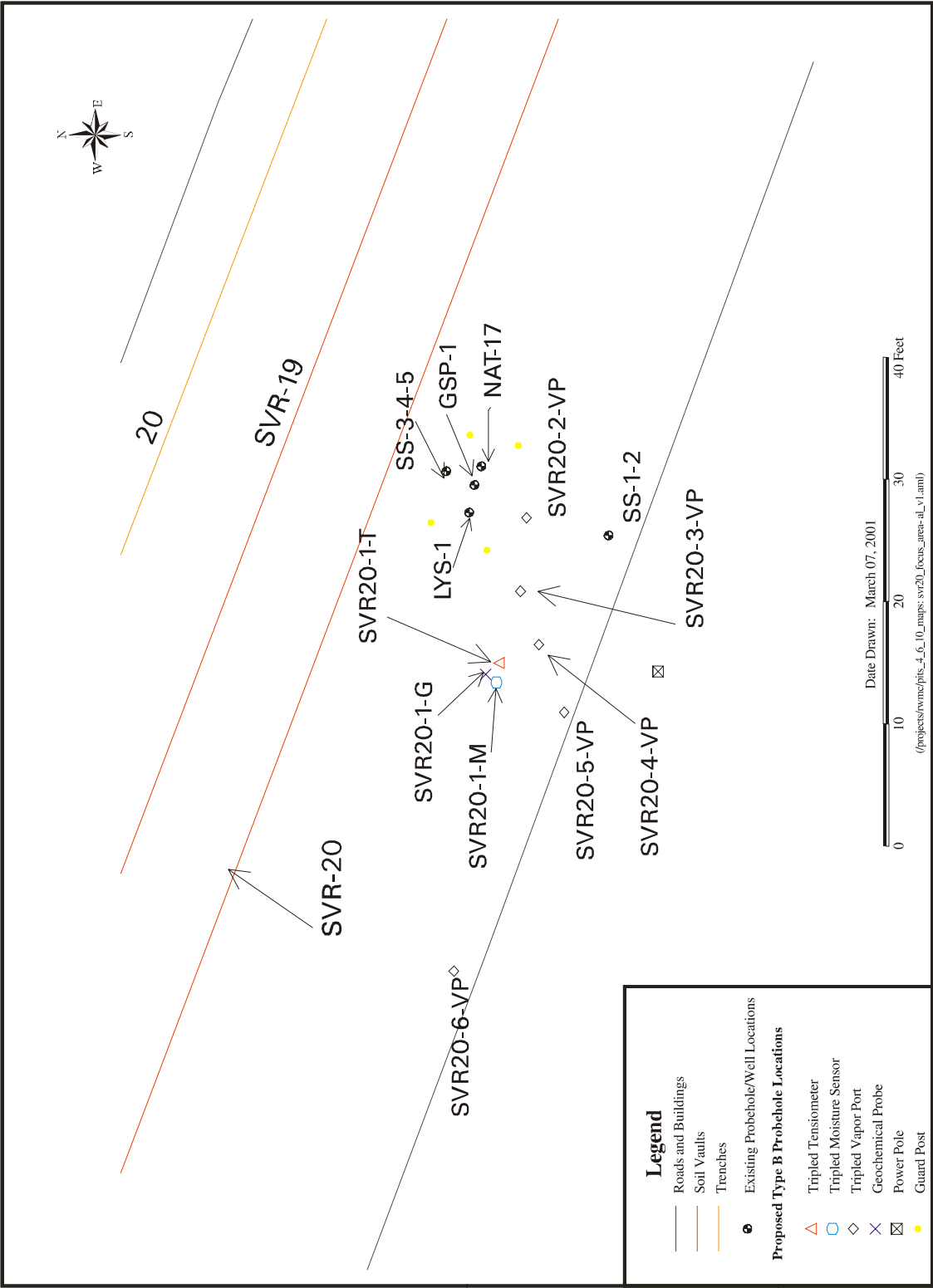


Figure 12. Proposed Type B probehole locations surrounding Soil Vault Row 20.

Table 9. Breakdown of probehole locations by area and probehole naming.

| Instrument/ Location/ Focus | Tensiometer | Soil Moisture Probe | Lysimeters | Vapor Port Probe | Geochemical Probe | Visual Probe |
|--|-------------------------------------|------------------------|------------------------|--|----------------------|--------------|
| Instruments per probe | 1 | 3 (typical) | 1 | 1 | 1 | 1 |
| Probes per bundle | 3 | 1 | 2 | 3 | 1 | 1 |
| Total sample (measurement) points | 90 | 90 | 30 | 63 | 8 | 13 |
| Total probe bundles | 30 | 30 | 15 | 21 | 8 | 13 |
| Pit 4 | 15 | 15 | 4 | 5 | 2 | 5 |
| Volatile organic compound (VOC) focus | 743-03-T1 743-03-T2 743-03-T3 | 743-03-M | 743-03-L1 743-03-L2 | 743-03-VP1 743-03-VP2 743-03-VP3 | 743-03-G | 743-03-V |
| VOC focus and depleted uranium (DU) focus | 743-08-T1 743-08-T2 743-08-T3 | 743-08-M | 743-08-L1 743-08-L2 | 743-08-VP1 743-08-VP2 743-08-VP3 | 743-08-G | 743-08-V |
| VOC focus | 743-18-T1 743-18-T2 743-18-T3 | 743-18-M | 743-18-L1 743-18-L2 | 743-18-VP1 743-18-VP2 743-18-VP3 | | 743-18-V |
| | 743-xx-T1 743-xx-T2 743-xx-T3 | 743-xx-M | 743-xx-L1 743-xx-L2 | 743-xx-VP1 743-xx-VP2 743-xx-VP3 | | 743-xx-V |
| | 743-xx-T1 743-xx-T2 743-xx-T3 | 743-xx-M | | 743-xx-VP1 743-xx-VP2 743-xx-VP3 | | 743-xx-V |
| | 743-xx-T1 743-xx-T2 743-xx-T3 | 743-xx-M | | | | |
| | MM1-1-T1 MM1-1-T2 MM1-1-T3 | MM1-1-M | | | | |
| | MM1-2-T1 MM1-2-T2 MM1-2-T3 | MM1-2-M | | | | |
| | MM1-3-T1 MM1-3-T2 MM1-3-T3 | MM1-3-M | | | | |
| | MM2-1-T1 MM2-1-T2 MM2-1-T3 | MM2-1-M | | | | |
| | MM2-2-T1 MM2-2-T2 | MM2-2-M | | | | |

Table 9. (continued).

| Instrument/ Location/ Focus | Tensiometer | Soil Moisture Probe | Lysimeters | Vapor Port Probe | Geochemical Probe | Visual Probe |
|-----------------------------------|-------------|------------------------|-----------------|---------------------|----------------------|--------------|
| Pit 4 (continued) VOC focus | MM2-2-T3 | | | | | |
| | MM2-3-T1 | MM2-3-M | | | | |
| | MM2-3-T2 | | | | | |
| | MM2-3-T3 | | | | | |
| | MM3-1-T1 | MM3-1-M | | | | |
| | MM3-1-T2 | | | | | |
| | MM3-1-T3 | | | | | |
| | MM3-2-T1 | MM3-2-M | | | | |
| | MM3-2-T2 | | | | | |
| | MM3-2-T3 | | | | | |
| | MM3-3-T1 | MM3-3-M | | | | |
| | MM3-3-T2 | | | | | |
| | MM3-3-T3 | | | | | |
| Pit 5 | 2 | 2 | 2 | 2 | 2 | 1 |
| | Pit5-1-T1 | Pit5-1-M | Pit5-1-L1 | Pit5-1-VP1 | Pit5-1-G | Pit5-1-V |
| | Pit5-1-T2 | | Pit5-1-L2 | Pit5-1-VP2 | | |
| | Pit5-1-T3 | | | Pit5-1-VP3 | | |
| | Pit5-2-T1 | Pit5-2-M | Pit5-2-L1 | Pit5-2-VP1 | Pit5-2-G | |
| | Pit5-2-T2 | | Pit5-2-L2 | Pit5-2-VP2 | | |
| | Pit5-2-T3 | | | Pit5-2-VP3 | | |
| Pit 6 | 0 | 0 | 0 | 3 | 0 | 1 |
| | | | | Pit6-1-VP1 | | Pit6-1-V |
| | | | | Pit6-1-VP2 | | |
| | | | | Pit6-1-VP3 | | |
| | | | | Pit6-2-VP1 | | |
| | | | | Pit6-2-VP2 | | |
| | | | | Pit6-2-VP3 | | |
| | | | | Pit6-3-VP1 | | |
| | | | | Pit6-3-VP2 | | |
| | | | | Pit6-3-VP3 | | |
| Pit 10 | 11 | 11 | 8 | 3 | 2 | 6 |
| DU focus | DU-10-T1 | DU-10-M | DU-10-L1 | DU-10-VP1 | DU-10-G | DU-10-V |
| | DU-10-T2 | | DU-10-L2 | DU-10-VP2 | | |
| | DU-10-T3 | | (7.5 ft, 190°) | DU-10-VP3 | | |
| DU focus | DU-14-T1 | DU-14-M | DU-14-L1 | DU-14-VP1 | | DU-14-V |
| | DU-14-T2 | | DU-14-L2 (8 | DU-14-VP2 | | |
| | DU-14-T3 | | ft, 65°) | DU-14-VP3 | | |
| DU focus | DU-16-T1 | DU-16-M | DU-16-L1 | DU-16-VP1 | | DU-16-V |
| | DU-16-T2 | | DU-16-L2 | DU-16-VP2 | | |
| | DU-16-T3 | | (13.5 ft, 130°) | DU-16-VP3 | | |
| | | | DU-xx-L1 | | | |
| | | | DU-xx-L2 | | | |

Table 9. (continued).

| Instrument/ Location/ Focus | Tensiometer | Soil Moisture Probe | Lysimeters | Vapor Port Probe | Geochemical Probe | Visual Probe |
|--------------------------------------|--|------------------------|--|---|----------------------|--------------|
| Pit 10 (continued) Am/Np Focus | DU-08-T1 DU-08-T2 DU-08-T3 | DU-08-M | DU-08-L1 DU-08-L2 (14.5 ft, 190°) | | | DU-08-V |
| Am/Np focus | 741-8-T1 741-8-T2 741-8-T3 | 741-8-M | 741-8-L1 741-8-L2 (8 ft, 125°) | | 741-8-G | 741-8-V |
| Am/Np focus | 741-2-T1 741-2-T2 741-2-T3 | 741-2-M | 741-2-L1 741-2-L2 (11.5 ft, 85°) 741-xx-L1 741-xx-L2 | | | 741-2-V |
| | MM4-1-T1 MM4-1-T2 MM4-1-T3 | MM4-1-M | | | | |
| | MM4-2-T1 MM4-2-T2 MM4-2-T3 | MM4-2-M | | | | |
| | MM4-3-T1 MM4-3-T2 MM4-3-T3 | MM4-3-M | | | | |
| | MM4-4-T1 MM4-4-T2 MM4-4-T3 | MM4-4-M | | | | |
| | MM4-5-T1 MM4-5-T2 MM4-5-T3 | MM4-5-M | | | | |
| SVR-12 | 1 | 1 | 1 | 6 | 1 | 0 |
| | SVR12-1-T1 SVR12-1-T2 SVR12-1-T3 | SVR12-1-M | SVR12-1-L1 SVR12-1-L2 | SVR12-1-VP1 SVR12-1-VP2 SVR12-1-VP3 SVR12-2-VP1 SVR12-2-VP2 SVRxx-2-VP3 SVR12-3-VP1 SVR12-3-VP2 SVR12-3-VP3 | SVR12-1-G | |

Table 9. (continued).

| Instrument/ Location/ Focus | Tensiometer | Soil Moisture Probe | Lysimeters | Vapor Port Probe | Geochemical Probe | Visual Probe |
|-----------------------------------|--|------------------------|------------|---|----------------------|--------------|
| SVR-20 | 1 | 1 | 0 | 5 | 1 | 0 |
| | SVR20-1-T1 SVR20-1-T2 SVR20-1-T3 | SVR20-1-M | | Note: GSP1 series of VPs is in place, that is why SVR20-2 VP series starts below: SVR20-2-VP1 SVR20-2-VP2 SVR20-2-VP3 SVR20-3-VP1 SVR20-3-VP2 SVR20-3-VP3 SVR20-4-VP1 SVR20-4-VP2 SVR20-4-VP3 SVR20-5-VP1 SVR20-5-VP2 SVR20-5-VP3 SVR20-6-VP1 SVR20-6-VP2 SVR20-6-VP3 | SVR20-1-G | |

Table 10. Key that defines the last part of the probe name.

| ID | Probe Type |
|----|---------------------|
| T | Tensiometer |
| M | Soil moisture probe |
| L | Lysimeter |
| VP | Vapor port probe |
| V | Visual probe |

| ID | Vertical Placement |
|----|--------------------|
| 1 | Deep |
| 2 | Middle |
| 3 | Shallow |

The soil moisture probes will be named as indicated by Table 9. However, these probes often have three sensors placed vertically within the single probe string assembly. The same vertical placement nomenclature described above will be used to define sensor locations within the probe (e.g., 1 = deep and 3 = shallow).

3.3.2 Probe-Installation Sequence

This section describes the preferred sequence for probe installation. It will be used as a general guide only. Factors, such as probe availability and field preferences (e.g., the need to place certain probes first so the rig does not get “boxed in”), may change the suggested sequence described here.

For bundled (i.e., nested) probes of the same type (e.g., tensiometers), the preference is to install the deep probe first and the shallow probe last. This is preferred because if an obstruction of impenetrable material is encountered during installation of the first deep probe, this probe could be completed at the obstruction and be considered a middle or shallow probe. The subsequent probe installed in the bundle could be offset laterally in an attempt to clear the subsurface obstruction.

The general preference for the probe-installation sequence in a cluster is provided below.

- Visual probes
- Tensiometers
- Lysimeters or geochemical probes
- Soil moisture probes
- Vapor ports.

Issues (e.g., availability of probes) may alter the preferred sequence outlined here without significant consequence to the project. Visual probes may be installed first because this probe type is installed into the contact between the waste and underburden or basalt. In addition, video recording through the visual probe may provide valuable information to assist the field team in optimal placement of subsequent instruments (e.g., lysimeters), and tensiometers may then be installed. Using the deep tensiometer to provide depth information about the waste zone and underburden soil interface will give confidence in locating the lysimeter and geochemical probes at that contact. The soil moisture probes could then be installed because enough information regarding the lower contact would be known so that this probe could be installed effectively as a three-sensor unit. The vapor ports should be installed last, if practical. The vapor ports will not function if completed in saturated conditions. Saturated conditions are most likely at the waste zone and underburden contact, or at the underburden and basalt contact. Being able to tag the contact between the waste zone and the underburden soil and then installing the deep vapor port approximately 8 in. (20 cm) above this contact should allow for completion of this probe above the most likely perched water level and ensure that it is functional.

3.4 Probe-Installation Contingency

Probes may not be installed to the depth planned because of several factors, including probes not installed to targeted depths because of encounters with solid items (e.g., solid metallic waste), or the existence of shallower subsurface conditions than expected. Probes may also be installed deeper than planned (i.e., installation of a soil moisture probe below the contact between the waste and underburden soil in areas where information regarding this contact is scarce). Probes may also break or become inoperable during installation.

The following contingencies will be considered when evaluating the conditions described above. Typically, when multiple probes of the same type are being installed in one location, the deep probe will be installed first. If refusal is encountered prior to reaching a desired depth, consideration should be given to completing that probe as one of the shallower probes planned for that location. When that is not possible or where only one of that probe type is being installed at a subject location, consideration for installing another probe will be weighed against probe availability and current financial constraints.

Probes may be installed too deep below suggested completion intervals (i.e., waste to underburden contact). In these cases, it is anticipated that though the targeted depth was exceeded, useful data can still be gathered. It is unlikely that additional probes will be installed in this scenario.

Probes that are broken during installation are expected to be replaced, providing additional probes are available, and considering current financial constraints.

The project manager and project engineer, in consultation with the field crew, will make decisions regarding probe-installation contingencies.

4. SAMPLE DESIGNATION

A systematic 10-character sample identification code will be used to uniquely identify all samples. The uniqueness of the number is required for maintaining consistency and ensuring that no two samples are assigned the same identification code. The INEEL SMO assigns the sample numbers. Quality control samples will have a unique sample number to support a “blind” submittal to the analytical laboratories. The Integrated Environment Data Management System ensures the uniqueness of sample identification.

The unique sample number will be broken down into the following five parts:

- Initial project identifier
- Basic sample origin (either lysimeter or vapor port)
- Sequential sampling event number
- Field quality control identifier
- Bottle code.

The first part of the sample number, a two-character project identifier, has been established as “IP,” for integrated probing project. Care should be taken to ensure that this is clearly recorded as a capital “I” and not the numerical digit “1.” The second part of the sample number will be an “L” for “lysimeter-based water samples” or a “V” for “gas samples originating from vapor ports.” The third part of the number will be a three-digit sequential number starting at 001 and ending through 999, and will be unique to the individual sampling event (i.e., the group of samples collected from a single sampling port [e.g., deep lysimeter]) during the same time period. The next two digits will typically be an “01” or “02” for a regular or field duplicate sample, respectively. The final two characters refer to the bottle code identified in the sample plan tables (see Appendix B).

5. SAMPLING EQUIPMENT AND PROCEDURES

5.1 Physical Sample Collection and Handling

Various EDFs and TPRs describe the design of the systems and detail operations that support successful sample acquisition during this project. This FSP incorporates those EDF and TPR specifications by reference and includes any specifications that were not in the TPRs (e.g., acid types used in sample preservation).

A sample preparation facility (expected to be located in Waste Management Facility [WMF]-601) may be used to support sample preparation and limited analysis (e.g., VOC soil-gas samples collected from vapor ports). The sample preparation facility contains the following items to support collection, preparation, and transportation of samples:

- Radiologically controlled hood to support sample preparation (e.g., splitting water samples from the sample collection vessel to the individual, preserved sample containers)
- Exhaust line to vent exhausted gas from the multigas photoacoustic analyzer (i.e., the unit used to analyze soil-gas samples for VOCs)
- Sample refrigerator to store samples requiring cooling prior to shipment to laboratories
- Sample freezer to store ice for sample temperature control during transport
- Acid cabinet to store acids for sample preservation
- Storage and sampling supplies.

Because of different sample acquisition controls related to different subsurface radiological conditions, two different sampling protocols have been developed for this project: one for samples that require a glove bag, and one for those that do not require a glove bag. The protocols were established to cover the following groups:

- Glove bag collection is required: All water samples collected from lysimeters during this investigation and all gas samples collected from vapor ports located within the pits will require use of a glove bag for initial sample acquisition.
- Glove bag collection is not required: Radioactive gases collected from the SVRs will not require use of glove bags because radioactive particulate contamination is not expected while gas samples are being collected outside of buried waste.

All samples that require glove bag collection in the field are acquired with equipment defined in EDF-ER-239, *OU 7-13/14 Integrated Probing Project Sample Acquisition and Glove Bag Design* (Sifuentes and Moody 2001). This EDF describes the design of the sample acquisition equipment from the manifold located at the probe outlet ports to the delivery of a “lab-ready” split and preserved sample. This EDF includes the design of the glove bags and auxiliary equipment to support sample acquisition. The TPR-1674, “Glove Bag Supported Sample Acquisition from Type B Probes in the SDA,” is used to collect these samples. This TPR includes all aspects of acquiring samples from lysimeters and vapor ports in glove bags in the field. The procedure includes water sample handling activities in the sample preparation facility. The TPR also includes handling soil-gas samples analyzed using the multigas photoacoustic analyzer in the sample preparation facility.

Tritium and C-14 samples collected from vapor ports placed to monitor SVRs will not require use of a glove bag during sample acquisition. The evaluation supporting the decision on glove bag use while collecting radioactive soil-gas samples from the vapor ports is included in EDF-ER-248, “Estimated Emissions, Air Concentrations, and Worker Exposure to Tritium and C-14 Associated with Sample Collection and Analysis.” The EDF-ER-248 includes a radiological safety analysis for sampling soil gas containing C-14 and tritium. The EDF-ER-262, “Operable Unit 7-13/14 Integrated Probing Project Tritiated Soil Gas Sampling System for the Soil Vault Rows,” defines the tritiated soil gas sample acquisition system located around the SVRs. The TPR-1771, “Soil Gas Sampling in the Soil Vault Rows,” is used to acquire the tritium samples. The TPR-1571, “Soil Gas Sampling in the Soil Vault Rows and from the OCVZ VVET Stacks,” describes the procedure for preparing and collecting C-14 and tritium samples.

5.2 Electronic Sample Data Acquisition

The system to acquire electronic data from sensors in the Type B probes is described in EDF-ER-240, “OU 7-13/14 Integrated Probing Project Data Acquisition System for Type B Probes Design.” This EDF includes descriptions of standard output from tensiometers, moisture sensors, and the geochemical probes. Electronic data will be collected in accordance with TPR-1669, “Type B Probe Data Acquisition System Installation and Maintenance.” Electronic data downloaded from the Type B probes will be transferred to the INEEL hydrological data repository for access control and long-term archiving.

5.3 Field Documentation and Custody Requirements

5.3.1 Field Documentation

Additional details of the elements of sample documentation covered in this section are in the QAPjP. The field team leader or designee is responsible for controlling and maintaining all field documents and records and ensuring that all required documents are submitted to the Environmental Restoration field data coordinator within 6 weeks of the project completion.

The identification number and disposition of controlled documents (e.g., logbooks) will be recorded in the Environmental Restoration document control logbook. If any documents are lost, the loss of the document and an explanation of how the loss was rectified will be recorded in the document control logbook. The identification number and disposition of all damaged or destroyed field documents will also be recorded. All voided and completed documents will be maintained in a project file until project completion, at which time all logbooks, chain-of-custody copies, and other relevant records will be submitted to Environmental Restoration document control.

Necessary field documents include the following:

- Chain-of-custody forms
- Sample logbook
- Quality Assurance Project Plan
- This FSP
- Relevant TPRs
- Health and Safety Plan (Miller 2001).

5.3.2 Labels

A waterproof, gummed label identifies all samples. The label will contain sample collection time and date, sample identification number, preservation used (if any), type of analysis, and other pertinent information. MCP-1192, “Chain of Custody and Sample Labeling for ER and D&D&D Projects,” establishes the sample container labeling procedure for this project.

5.3.3 Sample Custody

The chain-of-custody record is a form that serves as a written record of sample handling. When a sample changes custody, the person(s) relinquishing and receiving the sample will sign a chain-of-custody record. Each change of possession will be documented, thus a written record that tracks sample handling will be established. MCP-1192 establishes the custody procedure for this project.

5.3.4 Logbooks

Information pertaining to sampling activities will be entered in the sample logbook. Entries will be dated and signed by the individual making the entry. All logbooks will have a quality control check for accuracy and completeness. MCP-1194, “Logbook Practices for ER and D&D&D Projects,” establishes the logbook use and administration procedure for this project.

5.4 Quality Assurance

Analytical procedures that support this project will generate both screening and definitive data, as defined by the QAPjP. Screening data will be supported by collection of a limited number of QA samples analyzed under standard laboratory conditions and resulting in definitive confirmation or, more appropriately, a data set to support an evaluation of the effectiveness of the screening data.

5.4.1 Quality Assurance for Water Samples

Water samples described in Section 3 will be analyzed in established laboratories under a task order SOW issued by the INEEL SMO, and data from the analyses will be considered definitive. Standard laboratory QA will be followed, with minor exceptions. Water sample volume is expected to be extremely limited, so some laboratory QA sample analyses requiring collection of extra sample volume (e.g., matrix spikes and matrix spike duplicates) may not be performed because the limited sample volume will typically be used for the analytical suites described in Section 3.

Table 1-5 of the QAPjP describes generally recommended field QA sampling. The table includes the following items:

- Duplicates
- Field blanks
- Trip blanks
- Equipment rinsate blanks.

For this project, duplicate samples will be collected at the frequency prescribed in the QAPjP, if sufficient sample material exists. Table 1-5 of the QAPjP recommends collecting the duplicate samples at a frequency of 5%. It is anticipated that the lysimeter from which the field duplicate can be collected can be determined only after the sample is collected and enough water is determined to be present to meet the analytical requirements for both the regular and the collocated duplicate sample. This will be a split

sample because it will be subdivided or split from the original sample following collection. Since the analytical laboratory may be splitting part of the sample, this duplicate may not be submitted “blind” to the laboratory.

Field blanks and equipment rinsates will not be collected as part of this investigation. Field blanks are generally used to evaluate cross contamination during sample collection activities. Because a dedicated and essentially closed system is used to collect the water samples, the chance of significant cross contamination is remote. In addition, equipment rinsates are not required because dedicated and disposable sampling equipment is being used and decontamination of the internal portions of sampling equipment is not anticipated.

Trip blanks are not anticipated to be collected during this investigation. Therefore, detections of VOCs will not be attributable to cross contamination during storage and transport. Not collecting trip blanks is expected to save a considerable amount of money. The savings is a result of the large numbers of trip blanks that would be required if shipped with every cooler containing samples for volatile-organic analysis, which is traditional with typical environmental investigations.

5.4.2 Quality Assurance for Volatile Organic Compound Soil-Gas Samples

Field QA associated with the analyses of VOC samples collected from the vapor ports and analyzed with a multigas photoacoustic analyzer will consist of analyses of the following sample types:

- Laboratory control samples (analyzed during use of the multigas photoacoustic analyzer)
- Duplicates.

Laboratory control samples will be analyzed with regular samples during field operations using the multigas photoacoustic analyzers. Laboratory control samples will be used as a measure of accuracy of the method. Typical laboratory control samples may include the suite established by the INEEL OCVZ program. These include calibration gases consisting of a mixture of each of the five target VOCs at concentrations of 1 ppm, 100 ppm, and a laboratory control sample containing CCL₄ at 1,000 ppm, with nitrogen as the balance for the suite of laboratory control samples. If the results of the calibration differ by more than 20% from the calibration gas standards, corrective action must be taken, which may include sending the analyzer back to the factory for recalibration. If soil-gas sampling has already started, sample collection and analysis may continue, however, the calibration problems and limitations of the data set will be noted.

Field duplicates will be collected, at an approximate 5% frequency of the regular samples, from vapor ports being sampled for VOCs. These will be collocated samples (i.e., a sample collected immediately following the collection of the regular sample from the same vapor port). Field duplicates collected in this manner are used to estimate field precision, which is a measure of variability assumed to be caused by field conditions.

In addition to the field duplicate described above, a second type of duplicate sample will be collected. Duplicate samples will be collected for standard laboratory GC/MS analysis, as an accuracy check on the multigas photoacoustic analyzer chosen for analysis of the regular VOC soil-gas samples. These samples are expected to be collected, using a summa canister, in accordance with TPR-1674 and analyzed by the environmental chemistry laboratory located at Central Facilities Area (CFA)-625 or at another approved facility. The analytical method currently used for VOC analysis at CFA-625 is Analytical Laboratories Department Procedure ACMM-9930, “GC/MS MFC for VOCs in Gas” (Crowder 2000). These duplicates will be used to verify the accuracy of the field method and will be

collected at the rate of approximately 5% of the regular samples. Following several rounds of sampling, the frequency of this QA check may be reevaluated and the frequency altered, as necessary.

5.5 Waste Management

Small amounts of investigation-derived waste will be generated by the sample-handling activities that support this project. The waste resulting from the activities during the OU 7-13/14 integrated probing project investigation could be classified into the following categories: (1) industrial (both conditional and nonconditional), (2) low-level, and (3) mixed low-level. These waste categories will be managed and disposed of in accordance with provisions in the final ROD for OU 7-13/14, the *INEEL Waste Acceptance Criteria (WAC)* (DOE-ID 2003), MCP-3475, “Temporary Storage of CERCLA-Generated Waste at the INEEL,” and applicable state and federal regulations. If unaltered samples are returned from the analytical laboratory or are archived for any reason, the samples will be handled in accordance with MCP-3480, “Environmental Instructions for Facilities, Processes, Materials and Equipment.” Waste management support will be provided by the Waste Generator Services (WGS) organization in accordance with MCP-3480.

All generated waste will be characterized as required by companywide management control procedures, DOE Orders 435.1, “Radioactive Waste Management,” and 5400.5, “Radiation Protection of the Public and the Environment,” and Resource Conservation and Recovery Act (RCRA) regulations found in 40 CFR 262.11. Based on the characterization, hazardous waste determinations will be performed and documented to assign the appropriate U.S. Environmental Protection Agency waste codes. A hazardous waste determination uses one of two approaches (or a combination of both) to determine whether the waste is RCRA hazardous waste. Process knowledge may be used if there is sufficient information to characterize the waste. Process knowledge may include direct knowledge of the source of the contamination or existing analytical data. Representative samples of the waste stream may also be analyzed. Process knowledge may influence the amount of sampling and analysis required to perform this characterization.

In addition to characterization of waste under RCRA, consideration must be given to the potential that the sampling waste could contain polychlorinated biphenyls (PCBs) above established regulatory thresholds (50 ppm). Polychlorinated biphenyls exist in some RFP waste (i.e., the source of the PCBs). However, the relatively low solubility characteristics of PCBs, and other controls, strongly suggest that residual waste generated from these sampling activities are unlikely to contain PCBs above established regulatory thresholds. All but the lightest PCBs have aqueous solubilities considerably below 1 ppm. (PCBs are generally considered very insoluble in water.) In addition, the lysimeters used to collect water samples (water being the only potential “carrier” for PCB contamination during this project) have inlet ports (e.g., sintered porous stainless steel) that are “water wet.” Therefore, if the probes were completed in areas containing PCB oils, the oils could not pass through the porous steel without displacing the water contained in the porous stainless steel. Regardless of any issue with PCBs, the vacuum required to displace this water would severely compromise the lysimeter (essentially make it inoperable for good) therefore, administrative controls are in place (e.g., TPR-1674) to eliminate this possibility. Finally, PCB solubility is known to increase when mixed with some organic solvents. Though this potential increase in solubility is unlikely to allow waste generated from this project to exceed regulatory thresholds, limited testing of sampling residuals by the analytical laboratory for PCBs is prudent and will be used to support a final PCB-related waste determination.

5.5.1 Waste Minimization and Segregation

Project waste will be minimized through design and planning to ensure efficient operations that do not generate unnecessary waste. Waste reduction philosophies and techniques will be emphasized as part

of the prejob briefing, and personnel will be encouraged to continuously attempt to improve methods for minimizing waste generation. Practices to be instituted to support waste minimization include, but are not limited to, the following:

- Restricting material, especially hazardous material entering radiological buffer areas, to that needed for work
- Substituting recyclable items for disposable items
- Reusing items, when practical
- Segregating contaminated and uncontaminated waste
- Segregating reusable items (e.g., personal protective equipment [PPE] and tools).

5.5.2 Packaging

All waste material packaging will comply with the INEEL WAC, U.S. Department of Transportation (DOT) regulations (49 CFR 171, 173, 177, and 178), and RCRA regulations found in 40 CFR 264, Subpart I. Storage containers used to store hazardous waste must be in good condition and compatible with the waste being stored. It is also important that containers selected for storage of all waste (e.g., hazardous, radioactive, or industrial) are compatible with final disposition plans for the waste. This will alleviate the need for repackaging the waste prior to shipment to a treatment or disposal facility. The following general container categories are anticipated for storage of various OU 7-13/14 Type B probing project investigation-derived waste and contaminated environmental media, if necessary:

- 55-gal (208-L) drums
- 20 × 8 × 8-ft (9 × 29 × 29-m), or similarly dimensioned, steel-reinforced cargo containers.

The WGS and packaging and transportation personnel will be consulted to verify the specific types of containers to be used for the anticipated waste. Only new or like-new containers will be used (except for cargo containers). Radioactive material must be packaged to adequately protect the material from weather, and the outside packaging must be free of removable radioactive contamination. It is anticipated that most of the contained waste and environmental media generated during the sampling investigations will be stored outside and, therefore, will need to be protected from the elements. The exception to this is waste stored in cargo containers.

5.5.3 Labeling

All waste containers will be labeled appropriately. Conditional waste will be labeled as such. All CERCLA investigation-derived waste will be labeled with a CERCLA waste label that includes an accumulation start date, waste description, applicable waste codes, and the generator's name. Each container will have a barcode label generated from the INEEL Integrated Waste Tracking System (IWTS) database. All container labels will be placed where they are clearly visible during storage and shipment. Drums will be labeled on top and on the side. If cargo containers are used, they will be labeled on two opposing sides. Radiation labels will be completed and placed on each container by a radiological control technician, as required by the INEEL *Radiological Control Manual*. During shipment, other information must be included on containers, such as applicable DOT labels, manifest number, gross weight, and complete name and address of shipper.

5.5.4 Storage, Inspections, and Record Keeping

Most containers of CERCLA investigation-derived waste generated from this investigation will be stored in a CERCLA storage area (CSA) located inside the SDA (e.g., CSA No. RWMC-CC027-SDA-A). Waste entering the CSA must comply with this FSP. The CSA complies with all applicable state and federal requirements regarding storage of hazardous and radioactive waste, including having a RCRA contingency plan, emergency communication system and equipment, alarms, and aisle space. When containers are brought into the CSA, the storage area operator will inventory the containers. Information to be recorded will include the IWTS barcode assigned to the container, type of container, type of waste inside the container (including potential waste codes), and the volume of waste inside the container. When each container is logged in, an evaluation will ensure incompatible waste will be segregated. Only personnel with the appropriate and required training will be allowed to receive waste into the CSA.

The CSA will be inspected weekly for leaks, spills, appropriate aisle space for emergency response, appropriate emergency response equipment, appropriate mitigation of any spills or noncompliance, compatibility between waste and containers, segregation requirements, appropriate labels, appropriate signs posted for compliance with applicable radiological requirements, and other applicable requirements and good practices. The weekly inspection will be documented in accordance with the CSA waste management plan. Only personnel with the appropriate and required training will be allowed to perform weekly inspections of the CSA.

All information generated from the storage and inspection of waste in the CSA is considered a quality record and must be kept on file indefinitely. Other quality records to be kept include material and container profiles contained in the INEEL IWTS electronic database. This database contains quality records of (1) sampling and analytical data for waste streams, (2) the hazardous waste determinations for each waste stream, (3) the types, quantities, and content description of containers associated with each waste stream, (4) records of all waste movement (e.g., shipment to an offsite or onsite approved disposal facility), (5) appropriate land disposal restriction notification and certification, and (6) documentation reflecting compliance with debris treatment performance standards.

5.5.5 Transportation

All CERCLA investigation-derived waste generated during the OU 7-13/14 Type B sampling investigations and moved outside of the RWMC will be transported to storage areas or approved offsite or onsite treatment and disposal facilities, in accordance with requirements identified in the INEEL WAC and applicable DOT and RCRA regulations. The WGS and packaging and transport personnel will be responsible for shipping all CERCLA investigation-derived waste. Personnel having the proper documentation may transport industrial waste to the INEEL landfill complex.

5.5.6 Waste Treatment and Disposition

Waste generated during the OU 7-13/14 Type B sampling investigation must be managed and disposed of in accordance with all applicable project documents and state and federal regulations. Disposal options for the various waste classifications are discussed below. Prior to waste disposal, the waste streams must comply with the waste acceptance criteria of the intended receiving facility and approval for disposal must be obtained.

In limited cases, some hazardous debris treatment may be conducted on site to support waste disposition and waste minimization goals. Material that would normally be considered for decontamination (e.g., a plastic glove bag) may be candidate material for debris treatment under 40 CFR 268.45 of RCRA. In the context of implementing this plan, these hazardous debris treatment

activities would be limited to washing and spraying nonporous materials (e.g., plastics). Hazardous debris (as provided in 40 CFR 268.45[c]) that has been treated using one of the specified extraction or destruction technologies, and does not exhibit a characteristic of hazardous waste after treatment (as identified in Subpart C, Part 261), is not hazardous waste and need not be managed in a Subtitle-C facility. However, any residues resulting from the treatment of hazardous debris (e.g., rags) will be managed in accordance with the relevant requirements of 40 CFR 268.45(d). These activities will be coordinated with WGS and project environmental affairs personnel.

5.5.7 Conditional and Nonconditional Industrial Waste

Conditional industrial waste would include clean PPE, RCRA-empty containers, or other items determined to be nonhazardous and nonradioactive. Conditional waste has been through the hazardous waste determination process and is typically disposed of in the INEEL landfill complex. Nonconditional industrial waste usually includes administrative paper waste and lunch-type waste, and is disposed of in green cold-waste dumpsters located around the INEEL. Waste from these dumpsters is disposed of at the INEEL landfill complex.

5.5.8 Mixed Hazardous and Radioactive Waste (Mixed Waste)

As seen in Table 11, some waste potentially generated in association with the OU 7-13/14 Type B integrated probing project-sampling activities may be classified as mixed waste, pending hazardous waste determination. Types of waste that could be classified as mixed waste include PPE, contamination control supplies, unused sample material, analytical residue, contaminated equipment, and decontamination fluid. Generally, waste coming into direct contact with liquid sample material collected from lysimeters would be candidate material for this characterization.

5.5.9 Radioactive Waste

Some waste, including that anticipated to be generated during the OU 7-13/14 Type B integrated probing project-sampling activities, will be classified as radioactive only (see Table 11). Radioactive waste has been identified as sample containers that held mixed waste and are now RCRA-empty. Disposal options include the RWMC or the INEEL CERCLA Disposal Facility.

If any of the projected mixed waste streams can be determined to be no longer hazardous, the classification could change to radioactive only. All waste classifications will be documented by completed hazardous waste determinations. As previously stated, disposal options for radioactive waste include the RWMC.

Table 11. Projected waste generation and waste management considerations.

| Potential Waste Stream | Base Composition | Probable Volume | Expected Characterization | Notes |
|---|--|--|--------------------------------------|--|
| Glove bags and internal piping and equipment | Plastics, high-efficiency particulate air (HEPA) filters, metal tubing, valves, and connectors | < 2 m ³ /year | Low-level waste (LLW) or mixed waste | — |
| Personal protective equipment (PPE) and wipes | Tyvek, latex, Kimwipes | < 2 m ³ /year | LLW or mixed waste | — |
| Liquid sample collection jars, laboratory pipettes | Fluorinated high-density polyethylene (HDPE), Teflon, Tefzel tubing, metal and plastic valves, glassware | < 2 m ³ /year | LLW or mixed waste | Use of empty container rule to exit RCRA |
| Original supply and sample container boxes, administrative waste paper | Paper, cardboard | < 1 m ³ /year | Nonconditional industrial waste | Disposition in green cold-waste dumpsters for INEEL landfill complex disposal |
| Used but “clean” PPE, nonradioactive Resource Conservation and Recovery Act (RCRA) -empty containers (e.g., Tedlar bags used in volatile organic compound [VOC] sampling) | PPE, Tedlar bags, glass and plastic bottles | < 1 m ³ /year | Conditional industrial waste | <p>INEEL landfill complex disposal expected</p> <p>Tedlar bags expected to be conditional following radiological swipe of the inside of the “wasted” bags</p> <p>Bags protected by HEPA, residual VOCs purged following analysis</p> |
| Tygon tubing, potentially C-14-gas contaminated | Tygon or plastic tubing, metal valves, fittings | < 0.1 m ³ /year (15 ft/day) | LLW or conditional industrial waste | Radiological control technician evaluation required. |

6. REFERENCES

Note: Company-controlled documents referenced in this section are revised routinely. The current versions of these documents apply to field use. Draft technical procedures are provided below for information only and do not become requirements until they are finalized.

- 42 USC § 9601 et seq., December 11, 1980, *United States Code*, “Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA/Superfund).”
- 40 CFR 141.15, *Code of Federal Regulations*, Title 40, “Protection of the Environment,” Subchapter D, “Water Programs,” Part 141, “National Primary Drinking Water Regulations,” Subpart .15, “Maximum Contaminant Levels for Radium-226, Radium-228, and Gross Alpha Particle Radioactivity in Community Water Systems.”
- 40 CFR 141.16, *Code of Federal Regulations*, Title 40, “Protection of the Environment,” Subchapter D, “Water Programs,” Part 141, “National Primary Drinking Water Regulations,” Subpart .16, “Maximum Contaminant Levels for Beta Particle and Photon Radioactivity from Man-Made Radionuclides in Community Water Systems.”
- 40 CFR 141.51, *Code of Federal Regulations*, Title 40, “Protection of the Environment,” Subchapter D, “Water Programs,” Part 141, “National Primary Drinking Water Regulations,” Subpart .51, “Maximum Contaminant Levels for Inorganic Contaminants.”
- 40 CFR 141.61, *Code of Federal Regulations*, Title 40, “Protection of the Environment,” Subchapter D, “Water Programs,” Part 141, “National Primary Drinking Water Regulations,” Subpart .61, “Maximum Contaminant Levels for Organic Contaminants.”
- 40 CFR 262.11, *Code of Federal Regulations*, Title 40, “Protection of Environment,” Part 262, “Standards Applicable to Generators of Hazardous Waste,” Section 11, “Hazardous Waste Determination.”
- 40 CFR 264 Subpart I, *Code of Federal Regulations*, Title 40, “Protection of Environment,” Part 264, “Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities,” Subpart I, “Use and Management of Containers.”
- 40 CFR 268.45, *Code of Federal Regulations*, Title 40, “Protection of Environment,” Part 268, “Land Disposal Restrictions,” Section 268.45, “Treatment Standards for Hazardous Debris.”
- 49 CFR 171, *Code of Federal Regulations*, Title 49, “Transportation,” Part 171, “General Information, Regulations, and Definitions.”
- 49 CFR 173, *Code of Federal Regulations*, Title 49, “Transportation,” Part 173, “Shippers – General Requirements for Shipments and Packagings.”
- 49 CFR 177, *Code of Federal Regulations*, Title 49, “Transportation,” Part 177, “Carriage by Public Highway.”
- 49 CFR 178, *Code of Federal Regulations*, Title 49, “Transportation,” Part 178, “Specifications for Packagings.”

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- Crowder, Catherine A., April 12, 2000, "GC/MS MFC for VOCs in Gas," ACMM-9930, Rev. 4, *Analytical Chemistry Methods Manual*, Idaho National Engineering and Environmental Laboratory, Bechtel BWXT Idaho, LLC, Idaho Falls, Idaho.
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Appendix A

Information Used to Determine Vertical Placement of Type B Probes Around Existing Logged Type A Probes

Appendix A

Information Used to Determine Vertical Placement of Type B Probes Around Existing Logged Type A Probes

The following report formed the basis to determine the vertical placement of Type B probes around the existing logged Type A probes.

WASTE BOUNDARIES AND DEPTH TO BASALT

Interpreted from Downhole Logging Data

Nicholas E. Josten and Hopi Salomon

Principle

The waste boundary interpretation was based on the principle that the waste zone contains less soil and greater void space than the overlying cap and underburden, although pockets of pure soil may certainly be scattered throughout the interior of the waste zone. On this principle, logging data were used to identify reductions in the amount of common soil components (especially silicon and potassium), as well as changes in water content and void space, as indicated by moisture log data. These reductions were interpreted to reflect the transition from pure soil to soil-waste mixtures. The shallowest transition was marked as the upper waste boundary and the deepest transition was marked as the lower waste boundary.

Method

Silicon, potassium, and moisture logs were the primary data sets used for interpreting waste boundaries, but thorium, calcium, hydrogen, and iron were also considered. Table A-1 shows the logging methods used for the various soil indicators. For each well grouping (i.e., 741, 743, and depleted uranium study areas), logging data were compiled into cross sections to accommodate recognition of trends between probes. A trend line representing the interpreted position of the soil-waste transition was constructed across each cross section. Depths were then read from the cross sections and compiled into Table A-2. Finally, interpreted boundaries were compared against contamination indicators (e.g., gross gamma, gross neutrons, and chlorine) to assure consistency and to recognize noise sources.

Table A-1. Logging methods used for waste boundary interpretation.

| Logging method | Soil indicators |
|------------------------------|----------------------------------|
| Passive spectral gamma-ray | K-40, Th-232 |
| Activated spectral gamma-ray | Silicon, calcium, hydrogen, iron |
| Neutron-neutron | Hydrogen, void space |

Depth to basalt was assumed to correspond with the drilling total depth, which was measured by the drilling crew after probe installation. In cases where the total depth was not measured, depth to basalt was estimated based on the maximum logging depth, which averaged 0.6 ft (18 cm) above the total depth.

In some cases, no lower waste boundary was recognized. In these cases the boundary was assumed to lay below the maximum logged depth and Table A-2 lists maximum logged depth as the minimum depth of this boundary.

Table A-2. Waste boundary depths and depth to basalt, based on logging data interpretation, and suggested vertical completion depths (all measurements in feet) below ground surface.

| Suggested Placement bgs by Probe Type | | | | | | | | | | | | | | | | | | | |
|---------------------------------------|-----------------|--------------------|---------------------|-------------------------|--------------------|-------------------------|-------------|------|-----|---------------------|------|-----|-----------|------|------------|------|-----|--------------------------------------|--------|
| Type A Well ID | Top of Waste | Bottom of Waste | Max Logged Depth | Drilling Total Depth | Depth to Basalt | Waste Zone Thickness | Tensiometer | | | Soil Moisture Probe | | | Lysimeter | | Vapor Port | | | Oxidation- Reduction Potential | |
| | | | | | | | T1 | T2 | T3 | M1 | M2 | M3 | L1 | L2 | VP1 | VP2 | VP3 | /pH | Visual |
| DU-01 | 4.7 | 10.2 | 13.7 | 14.3 | 14.3 | 5.5 | 10.2 | 6.5 | 4.7 | 10.2 | 7.5 | 4.7 | 10.2 | | 9.5 | 7.5 | 4.7 | 10.2 | 14.3 |
| DU-02 | 5.8 | 9.8 | 12 | 14.8 | 14.8 | 4 | 9.8 | 7.1 | 5.8 | 9.8 | 7.8 | 5.8 | 9.8 | | 9.1 | 7.8 | 5.8 | 9.8 | 14.8 |
| DU-03 | 5.3 | 9.6 | 13.8 | 14.5 | 14.5 | 4.3 | 9.6 | 6.7 | 5.3 | 9.6 | 7.5 | 5.3 | 9.6 | | 8.9 | 7.5 | 5.3 | 9.6 | 14.5 |
| DU-04 | No waste | No waste | 13.4 | 14 | 14 | | | | | | | | | | | | | | |
| DU-05 | 5.9 | 9.1 | 17.8 | 18.3 | 18.3 | 3.2 | 9.1 | 7.0 | 5.9 | 9.1 | 7.5 | 5.9 | 9.1 | | 8.4 | 7.5 | 5.9 | 9.1 | 18.3 |
| DU-06 | 5.2 | 9 | 17.7 | 18.5 | 18.5 | 3.8 | 9 | 6.5 | 5.2 | 9 | 7.1 | 5.2 | 9 | | 8.3 | 7.1 | 5.2 | 9 | 18.5 |
| DU-07 | 5.6 | 9 | 13.8 | 14.5 | 14.5 | 3.4 | 9 | 6.7 | 5.6 | 9 | 7.3 | 5.6 | 9 | | 8.3 | 7.3 | 5.6 | 9 | 14.5 |
| DU-08 | 5.2 | 16.3 | 17.7 | 18.4 | 18.4 | 11.1 | 16.3 | 8.9 | 5.2 | 16.3 | 10.8 | 5.2 | 16.3 | 14.5 | 15.6 | 10.8 | 5.2 | 16.3 | 18.4 |
| DU-09 | 5.3 | 11.2 | 12.9 | 13.2 | 13.2 | 5.9 | 11.2 | 7.3 | 5.3 | 11.2 | 8.3 | 5.3 | 11.2 | | 10.5 | 8.3 | 5.3 | 11.2 | 13.2 |
| DU-10 | 4.6 | 10 | 16.8 | 17.3 | 17.3 | 5.4 | 10 | 6.4 | 4.6 | 10 | 7.3 | 4.6 | 10 | 7.5 | 9.3 | 7.3 | 4.6 | 10 | 17.3 |
| DU-11 | 4.9 | 15.6 | 17.5 | 18.1 | 18.1 | 10.7 | 15.6 | 8.5 | 4.9 | 15.6 | 10.3 | 4.9 | 15.6 | | 14.9 | 10.3 | 4.9 | 15.6 | 18.1 |
| DU-12 | 6.4 | 13.2 | 17.8 | 18.3 | 18.3 | 6.8 | 13.2 | 8.7 | 6.4 | 13.2 | 9.8 | 6.4 | 13.2 | | 12.5 | 9.8 | 6.4 | 13.2 | 18.3 |
| DU-13 | 6.3 | 15.9 | 17.6 | 18.1 | 18.1 | 9.6 | 15.9 | 9.5 | 6.3 | 15.9 | 11.1 | 6.3 | 15.9 | | 15.2 | 11.1 | 6.3 | 15.9 | 18.1 |
| DU-14 | 5.5 | >16.7 | 16.7 | 17.2 | 17.2 | 11.2 | 16.7 | 9.2 | 5.5 | 16.7 | 11.1 | 5.5 | 16.7 | 8 | 16 | 11.1 | 5.5 | 16.7 | 17.2 |
| DU-15 | 5.8 | >16.6 | 16.6 | 17.1 | 17.1 | 10.8 | 16.6 | 9.4 | 5.8 | 16.6 | 11.2 | 5.8 | 16.6 | | 15.9 | 11.2 | 5.8 | 16.6 | 17.1 |
| DU-16 | 5.4 | >15.9 | 15.9 | 20.2 | 20.2 | 10.5 | 15.9 | 8.9 | 5.4 | 15.9 | 10.7 | 5.4 | 15.9 | 13.5 | 15.2 | 10.7 | 5.4 | 15.9 | 20.2 |
| DU-17 | 6 | 18.4 | 19.7 | NA | 20.3 | 12.4 | 18.4 | 10.1 | 6 | 18.4 | 12.2 | 6 | 18.4 | | 17.7 | 12.2 | 6 | 18.4 | 20.3 |
| 741-02 | 7.9 | 14.2 | 17.5 | 18.1 | 18.1 | 6.3 | 14.2 | 10.0 | 7.9 | 14.2 | 11.1 | 7.9 | 14.2 | 11.5 | 13.5 | 11.1 | 7.9 | 14.2 | 18.1 |
| 741-03 | 7.3 | 16 | 18.7 | 20.7 | 20.7 | 8.7 | 16 | 10.2 | 7.3 | 16 | 11.7 | 7.3 | 16 | | 15.3 | 11.7 | 7.3 | 16 | 20.7 |
| 741-04 | 7.4 | 18.2 | 23.7 | 24.3 | 24.3 | 10.8 | 18.2 | 11.0 | 7.4 | 18.2 | 12.8 | 7.4 | 18.2 | | 17.5 | 12.8 | 7.4 | 18.2 | 24.3 |
| 741-06 | 6.7 | >17.4 | 17.4 | 18 | 18 | 10.7 | 17.4 | 10.3 | 6.7 | 17.4 | 12.1 | 6.7 | 17.4 | | 16.7 | 12.1 | 6.7 | 17.4 | 18 |
| 741-08 | 5.8 | 15.7 | 21.3 | 21.8 | 21.8 | 9.9 | 15.7 | 9.1 | 5.8 | 15.7 | 10.8 | 5.8 | 15.7 | 8 | 15 | 10.8 | 5.8 | 15.7 | 21.8 |

Table A-2. (continued).

| Suggested Placement bgs by Probe Type | | | | | | | | | | | | | | | | | | | | |
|---------------------------------------|--------------|-----------------|------------------|----------------------|-----------------|----------------------|-------------|------|------|---------------------|------|------|-----------|------|------------|------|------|-------------------------------|------|------|
| Type A Well ID | Top of Waste | Bottom of Waste | Max Logged Depth | Drilling Total Depth | Depth to Basalt | Waste Zone Thickness | Tensiometer | | | Soil Moisture Probe | | | Lysimeter | | Vapor Port | | | Oxidation-Reduction Potential | | |
| | | | | | | | T1 | T2 | T3 | M1 | M2 | M3 | L1 | L2 | VP1 | VP2 | VP3 | G | V | |
| 741-09 | 9.7 | >13.8 | 13.8 | 14.3 | 14.3 | 4.1 | 13.8 | 11.1 | 9.7 | 13.8 | 11.8 | 9.7 | 13.8 | | | 13.1 | 11.8 | 9.7 | 13.8 | 14.3 |
| 743-01 | 7 | 11 | 15.5 | 17.2 | 17.2 | 4 | 11 | 8.3 | 7 | 11 | 9.0 | 7 | 11 | | | 10.3 | 9.0 | 7 | 11 | 17.2 |
| 743-02 | 6.5 | 13.5 | 19.4 | 20.7 | 20.7 | 7 | 13.5 | 8.8 | 6.5 | 13.5 | 10.0 | 6.5 | 13.5 | | | 12.8 | 10.0 | 6.5 | 13.5 | 20.7 |
| 743-03 | 7 | 13 | 19.1 | 19.5 | 19.5 | 6 | 13 | 9.0 | 7 | 13 | 10.0 | 7 | 13 | 10 | | 12.3 | 10.0 | 7 | 13 | 19.5 |
| 743-04 | 7 | 15 | 24.5 | 25.5 | 25.5 | 8 | 15 | 9.7 | 7 | 15 | 11.0 | 7 | 15 | | | 14.3 | 11.0 | 7 | 15 | 25.5 |
| 743-05 | 8 | 23.5 | 26.3 | 27 | 27 | 15.5 | 23.5 | 13.2 | 8 | 23.5 | 15.8 | 8 | 23.5 | | | 22.8 | 15.8 | 8 | 23.5 | 27 |
| 743-06 | 7 | >25.8 | 25.8 | 26.2 | 26.2 | 18.8 | 25.8 | 13.3 | 7 | 25.8 | 16.4 | 7 | 25.8 | | | 25.1 | 16.4 | 7 | 25.8 | 26.2 |
| 743-07 | 7 | >24.7 | 24.7 | 25.3 | 25.3 | 17.7 | 24.7 | 12.9 | 7 | 24.7 | 15.9 | 7 | 24.7 | | | 24 | 15.9 | 7 | 24.7 | 25.3 |
| 743-08 | 10.5 | >24.9 | 24.9 | 25.3 | 25.3 | 14.4 | 24.9 | 15.3 | 10.5 | 24.9 | 17.7 | 10.5 | 24.9 | 22.5 | | 24.2 | 17.7 | 10.5 | 24.9 | 25.3 |
| 743-09 | 8 | >23.8 | 23.8 | 24.3 | 24.3 | 15.8 | 23.8 | 13.3 | 8 | 23.8 | 15.9 | 8 | 23.8 | | | 23.1 | 15.9 | 8 | 23.8 | 24.3 |
| 743-10 | 9 | >25.4 | 25.4 | 25.8 | 25.8 | 16.4 | 25.4 | 14.5 | 9 | 25.4 | 17.2 | 9 | 25.4 | | | 24.7 | 17.2 | 9 | 25.4 | 25.8 |
| 743-11 | 11 | >24.9 | 24.9 | 25.5 | 25.5 | 13.9 | 24.9 | 15.6 | 11 | 24.9 | 18.0 | 11 | 24.9 | | | 24.2 | 18.0 | 11 | 24.9 | 25.5 |
| 743-12 | 11 | >24.4 | 24.4 | 25 | 25 | 13.4 | 24.4 | 15.5 | 11 | 24.4 | 17.7 | 11 | 24.4 | | | 23.7 | 17.7 | 11 | 24.4 | 25 |
| 743-13 | 10 | >25 | 25 | 25.6 | 25.6 | 15 | 25 | 15.0 | 10 | 25 | 17.5 | 10 | 25 | | | 24.3 | 17.5 | 10 | 25 | 25.6 |
| 743-14 | 11 | >22.4 | 22.4 | 23 | 23 | 11.4 | 22.4 | 14.8 | 11 | 22.4 | 16.7 | 11 | 22.4 | | | 21.7 | 16.7 | 11 | 22.4 | 23 |
| 743-15 | 11 | >21.4 | 21.4 | 21.9 | 21.9 | 10.4 | 21.4 | 14.5 | 11 | 21.4 | 16.2 | 11 | 21.4 | | | 20.7 | 16.2 | 11 | 21.4 | 21.9 |
| 743-16 | 9 | >14.9 | 14.9 | 16.2 | 16.2 | 5.9 | 14.9 | 11.0 | 9 | 14.9 | 12.0 | 9 | 14.9 | | | 14.2 | 12.0 | 9 | 14.9 | 16.2 |
| 743-17 | 9 | 17 | 19.2 | 20.7 | 20.7 | 8 | 17 | 11.7 | 9 | 17 | 13.0 | 9 | 17 | | | 16.3 | 13.0 | 9 | 17 | 20.7 |
| 743-18 | 10 | 16 | 20.5 | 21 | 21 | 6 | 16 | 12.0 | 10 | 16 | 13.0 | 10 | 16 | 13 | | 15.3 | 13.0 | 10 | 16 | 21 |
| 743-20 | 9.5 | 14.5 | 15.7 | 16.3 | 16.3 | 5 | 14.5 | 11.2 | 9.5 | 14.5 | 12.0 | 9.5 | 14.5 | | | 13.8 | 12.0 | 9.5 | 14.5 | 16.3 |
| 743-21 | 12.5 | >12.7 | 12.7 | 14.8 | 14.8 | 0.2 | 12.7 | 12.6 | 12.5 | 12.7 | 12.6 | 12.5 | 12.7 | | | 12 | 12.6 | 12.5 | 12.7 | 14.8 |
| 743-22 | 10 | >17 | 20.8 | 21.4 | 21.4 | 7 | 17 | 12.3 | 10 | 17 | 13.5 | 10 | 17 | | | 16.3 | 13.5 | 10 | 17 | 21.4 |
| 743-23 | >7.8 | >7.8 | 7.8 | 8.4 | 8.4 | 0 | | | | | | | | | | | | | | |
| 743-24 | 9.5 | 13 | 22.5 | 23.5 | 23.5 | 3.5 | 13 | 10.7 | 9.5 | 13 | 11.3 | 9.5 | 13 | | | 12.3 | 11.3 | 9.5 | 13 | 23.5 |

Table A-2. (continued).

| Suggested Placement bgs by Probe Type | | | | | | | | | | | | | | | | | | | | |
|---------------------------------------|-----------------|--------------------|---------------------|-------------------------|--------------------|-------------------------|-------------|------|------|---------------------|------|------|-----------|----|-----|------------|------|------|---|--------|
| Type A Well ID | Top of Waste | Bottom of Waste | Max Logged Depth | Drilling Total Depth | Depth to Basalt | Waste Zone Thickness | Tensiometer | | | Soil Moisture Probe | | | Lysimeter | | | Vapor Port | | | Oxidation- Reduction Potential /pH | Visual |
| | | | | | | | T1 | T2 | T3 | M1 | M2 | M3 | L1 | L2 | VP1 | VP2 | VP3 | G | | |
| 743-25 | >17.3 | >17.3 | 17.3 | 17.8 | 17.8 | 0 | | | | | | | | | | | | | | V |
| 743-32 | >12 | >12 | 12 | 12.1 | 12.1 | 0 | | | | | | | | | | | | | | |
| 743-33 | >11.4 | >11.4 | 11.4 | 12.1 | 12.1 | 0 | | | | | | | | | | | | | | |
| 743-34 | >11.3 | >11.3 | 11.3 | 11.9 | 11.9 | 0 | | | | | | | | | | | | | | |
| 743-35 | 9.3 | 10.7 | 15.8 | 16.4 | 16.4 | 1.4 | 10.7 | 9.8 | 9.3 | 10.7 | 10.0 | 9.3 | 10.7 | | | 10 | 10.0 | 9.3 | 10.7 | 16.4 |
| 743-36 | 7 | 17 | 25.4 | 25.7 | 25.7 | 10 | 17 | 10.3 | 7 | 17 | 12.0 | 7 | 17 | | | 16.3 | 12.0 | 7 | 17 | 25.7 |
| 743-37 | 8.6 | 18.5 | 25.5 | 25.8 | 25.8 | 9.9 | 18.5 | 11.9 | 8.6 | 18.5 | 13.6 | 8.6 | 18.5 | | | 17.8 | 13.6 | 8.6 | 18.5 | 25.8 |
| 743-38 | 6.7 | 11.6 | 14.9 | 15.5 | 15.5 | 4.9 | 11.6 | 8.3 | 6.7 | 11.6 | 9.2 | 6.7 | 11.6 | | | 10.9 | 9.2 | 6.7 | 11.6 | 15.5 |
| 743-39 | 6.7 | 11.7 | 23.3 | 23.6 | 23.6 | 5 | 11.7 | 8.4 | 6.7 | 11.7 | 9.2 | 6.7 | 11.7 | | | 11 | 9.2 | 6.7 | 11.7 | 23.6 |
| 743-40 | 5.8 | 13.8 | 19.8 | 20.1 | 20.1 | 8 | 13.8 | 8.5 | 5.8 | 13.8 | 9.8 | 5.8 | 13.8 | | | 13.1 | 9.8 | 5.8 | 13.8 | 20.1 |
| 743-41 | 11.8 | 15.2 | 22.1 | NA | 22.7 | 3.4 | 15.2 | 12.9 | 11.8 | 15.2 | 13.5 | 11.8 | 15.2 | | | 14.5 | 13.5 | 11.8 | 15.2 | 22.7 |
| 743-42 | 8.4 | 14.7 | 21.9 | 22.2 | 22.2 | 6.3 | 14.7 | 10.5 | 8.4 | 14.7 | 11.6 | 8.4 | 14.7 | | | 14 | 11.6 | 8.4 | 14.7 | 22.2 |

Appendix B

Examples of Typical Sample Management Office Sample Plan Tables Used for the First Round of Sampling in the Pits

Plan Table Number: SDAPROBING

SAP Number: INEEL/EXT-2000-01435

Date: 03/07/2001

Project: RWMC

Project Manager: BAUMER, A. R.

SMO Contact: MCGRIFF, T. W.

| Sample Description | | | | | | Sample Location | | | | Enter Analysis Types (AT) and Quantity Requested | | | | | | | | | | | | | | | | | | | | |
|--------------------|-------------|---------------|-----------|-----------------|--------------|-----------------|----------|------------------|------------|--|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|------|------|------|------|------|--|
| Sampling Activity | Sample Type | Sample Matrix | Coil Type | Sampling Method | Planned Date | Area | Location | Type of Location | Depth (ft) | Enter Analysis Types (AT) and Quantity Requested | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | AT1 | AT2 | AT3 | AT4 | AT5 | AT6 | AT7 | AT8 | AT9 | AT10 | AT11 | AT12 | AT13 | AT14 | AT15 | AT16 | AT17 | AT18 | AT19 | AT20 | |
| | | | | | | | | | | 3A | AV | AZ | NB | RH | VT | | | | | | | | | | | | | | | |
| IPLO18 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO19 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO20 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO21 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO22 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO23 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO24 | REG/QC | GROUND WATER | DUP | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 2 | 2 | 2 | | | | | | | | | | | | | | | | | | |
| IPLO25 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO26 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO27 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO28 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | 1 | 1 | 1 | | | | | | | | | | | | | | | | | | |
| IPLO29 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | | | | | 1 | | | | | | | | | | | | | | | | |
| IPLO30 | REG | GROUND WATER | GRAB | LYS | 04/23/2001 | RWMC | SDA | LYSIMETER | TBD | | | | | 1 | | | | | | | | | | | | | | | | |
| IPV001 | REG | SUBSURF VAPOR | GRAB | SMCAN | 04/23/2001 | RWMC | SDA | VAPOR PORT | TBD | | | | | | 1 | | | | | | | | | | | | | | | |
| IPV002 | REG | SUBSURF VAPOR | GRAB | SMCAN | 04/23/2001 | RWMC | SDA | VAPOR PORT | TBD | | | | | | 1 | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

The sampling activity displayed on this table represents the first six characters of the sample identification number. The complete sample identification number (10 characters) will appear on field guidance forms and sample labels.

| | | |
|----------------------------------|-------|--|
| AT1: Analysis Suite #1 | AT11: | Comments: |
| AT2: Appendix IX VOA6 | AT12: | The duplicate and VOA MSMSD samples are considered opportunistic and will be taken only if adequate volume is collected for all other requested analyses first. Additionally, if adequate volume is collected from a different sampling location, the sample ID numbers for the duplicate and VOA MSMSD samples may be changed on the day of sampling. |
| AT3: Appendix IX VOA6 MSMSD | AT13: | |
| AT4: Nitrate/Nitrite - Speciated | AT14: | |
| AT5: Radiochemistry - Suite 1 | AT15: | |
| AT6: VOCs (Mod. TC-14) | AT16: | Metals (TAL) is defined as Appendix IX metals except mercury and tin. |
| AT7: | AT17: | Appendix IX VOA list does not include all Appendix IX compounds but is a modified list currently used by the lab (INTEC) |
| AT8: | AT18: | |
| AT9: | AT19: | A priority list of analyses based on collected volume has been established in the SOW for this project. |
| AT10: | AT20: | |

Analysis Suites:

Contingencies:

Analysis Suite #1 includes: Am-241, C-14, Tc-99, Metals (TAL), Np-237, Gamma Spec, Pu-iso, Tritium, U-iso, Iodine-129

Radiochemistry - Suite 1 includes: C-14, Tc-99, Ni-59, Nb-94, Ni-63, Gamma Spec, Tritium

Appendix C

Information Used to Evaluate Errors in Volatile Organic Contaminant Gas Concentrations from Known Interferent Gases

Information Used to Evaluate Errors in Volatile Organic Contaminant Gas Concentrations from Known Interfering Gases

Immunity to interfering species is an important consideration to mitigate interference during analysis. Concentration and type of potentially interfering gases are important aspects in optical filter selection. Therefore, previous analytical data from the soil gas surveys around the Subsurface Disposal Area (SDA) were evaluated to support selection of optical filters. The highest concentration of volatile organic compounds (VOCs) detected in shallow soil gas (1998 survey at Pit 4) has been detected using a Brüel & Kjaer (B&K) Model 1302 and, as a result, has been limited to the five gases that the unit was set up to evaluate (i.e., the organic contamination in the vadose zone [OCVZ] suite). Gas chromatography/mass spectrometry gas data was also collected from wells sampled outside of the waste between 1994 and 1997, and also used in this evaluation. The highest concentrations detected from any of these data sets were used to evaluate the effects of the potentially interferent gases on the five VOCs of interest. Tables C-1, C-2, and C-3 are all set up, as follows.

Column 1 contains the 10 VOCs detected in the surveys described above. The first five are the “OCVZ suite,” which had all been detected in shallow soil gas immediately above the waste. The second grouping of five compounds, or those below the row dividing line, were additional compounds detected in monitoring wells around the SDA (i.e., further from the source). It is assumed that these compounds are also present in the shallow soil gas, however, data could not be obtained to prove this assumption.

The first column of concentration data (titled: Maximum Previous Concentration [ppm]) is the maximum level detected from the monitoring described above. The fourth column (titled: Estimated Type B Concentration [ppm]) gives typical concentrations assumed from samples that will be collected in the waste using Type B vapor ports. The following are concentration assumptions.

- A multiplication factor of 5x was used for the first five gases, resulting in an expected Type B concentration for carbon tetrachloride of over 30,000 ppm, which is assumed to be reasonable
- A larger multiplication factor of 20x was used for the second five gases, because the sampling was conducted at a greater distance from the source.

The sixth column lists the optical filters selected by the instrument manufacture’s U.S. representative (California Analytical Instruments) to best evaluate the five VOCs of interest with the minimum interference from the listed potential interferent gases. The seventh column gives the optimal analytical detection range for which the instrument is calibrated, using the selected optical filters. The following five columns give the detection level (ppm) on each of the selected optical filters for each of the VOCs anticipated to be present within the waste.

The last five columns state the calculated contribution of the interferent gas in ppm, from the compounds indicated in each row on the left side of the table, to each of the five compounds of interest (designated as the final five column headings). These are calculated using the estimated Type B concentration data for the interferent gases, the optical filter detection level data, and an assumption of the cross compensation gained from the instrument’s software.

The effects of the cross compensation are given separately in the three tables. The assumptions on “measured” concentration resulting from no internal software correction (called cross compensation) are given in Table C-1. The use of the software cross compensation with assumptions on its uncertainty reduction, which the vendor has stated ranges between 90 and 95%, are given in the Tables C-2, and C-3.

Table C-1, representing calculated data generated assuming no instrument cross compensation, indicates concentration overestimation errors ranging from 24.1 to 1,183%. Table C-3, representing cross compensation of 95%, indicates overestimation errors of between 1.2 and 59.1%. Table C-2 assumes 90% cross compensation effectiveness and results in overestimation errors of between 2.4 and 118% for the five compounds of interest.

The data contained in Table C-2 was chosen to describe other aspects of inputs to sensitivity of the overestimation error. For example, three compounds known to exist within the pits provide unwanted interference on the optical filter (UA 0976) selected for tetrachloroethene evaluation. The largest contributor to this “overestimation error” comes from the effect of the assumed high trichloroethene concentration (7,950 ppm) on the UA 0976 filter as an interferent gas. The relatively high value of trichloroethene will increase apparent tetrachloroethene concentrations by approximately 454 ppm, resulting in an apparent concentration more than 100% greater than the true concentration used in this example of 393 ppm. Error is also expected from 1,1,1-trichloroethane and 1,1,2-trichlor-1,2,2-trifluoroethane (Freon 113) on the optical filter used for carbon tetrachloride estimation, though its contribution adds less than 7% to the true concentration.

Recognizing the source of error is key to understanding the limitations of this equipment. It is expected that data generated from this instrument, as well as results from samples collected from the pits for gas chromatography/mass spectrometry analysis, will be used to provide a better estimate of error from this instrument in the future. This additional data may result in interest to further optimize filter selection.

Table C-1. Evaluation of interferent gases on measured concentration, assuming no software cross compensation.

| 8 | | | | | | | | | | 8 | | | | | | | | | |
|--|---|------------------|--------------------------------------|--------------------------------------|----------------|---------------|--|---------|---------|---------|---------|------------------|--|-----------|-------|-------|---------|----|--|
| Compound Name | Formula | Molecular Weight | Maximum Previous Concentration (ppm) | Estimated Type B Concentration (ppm) | Optical Filter | Range (ppm) | Optical Filter and Detection Level (ppm) | | | | | | Contribution of Interferent Gas (Row) to Compound of Interest (Column) (ppm) | | | | | | |
| | | | | | | | UA 0936 | UA 0971 | UA 0974 | UA 0975 | UA 0976 | CCl ₄ | CHCl ₃ | 1,1,1-TCA | TCE | PCE | | | |
| Carbon tetrachloride | CCl ₄ | 153.8 | 7,260 | 36,300 | UA 0936 | 6 to 100,000 | 6 | 0 | 21 | 7 | 16 | | | | 156 | 1,556 | | 91 | |
| Chloroform | CHCl ₃ | 119.4 | 1,550 | 7,750 | UA 0971 | 1 to 10,000 | 0 | 1 | 0 | 0 | 0 | | | | | | | | |
| 1,1,1-Trichloroethane (1,1,1-TCA) | C ₂ H ₃ Cl ₃ | 133.4 | 208 | 1,040 | UA 0974 | .09 to 9,000 | 0.6 | 0 | 0.09 | 1.2 | 8 | | 10,400 | | 260 | | 5 | | |
| Trichloroethene (TCE) | C ₂ HCl ₃ | 131.4 | 1,590 | 7,950 | UA 0975 | 0.3 to 10,000 | 0 | 0 | 4 | 0.3 | 0.07 | | | | 179 | | 4,543 | | |
| Tetrachloroethene (PCE) | C ₂ Cl ₄ | 165.8 | 78.5 | 393 | UA 0976 | .04 to 4,000 | 0 | 0 | 0 | 0 | 0.04 | | | | | | | | |
| 1,1,2-Trichlor-1,2,2-trifluoroethane | C ₂ Cl ₃ F ₃ | 187.4 | 8.2 | 164 | NA | NA | 0.07 | 0.02 | 0.05 | 0.5 | 5 | | 14,057 | 8,200 | 295 | 98 | 1 | | |
| 1,1-Dichloroethene | C ₂ H ₂ Cl ₂ | 96.94 | 0.79 | 16 | NA | NA | 0 | 0.15 | 0 | 1 | 0.21 | | | 105 | | 5 | 3 | | |
| 1,3,5-Trimethylbenzene | C ₉ H ₁₂ | 120.2 | 0.044 | 1 | NA | NA | 0 | 0 | 0 | 0 | 0 | | | | | | | | |
| Propane | C ₃ H ₈ | 44.1 | 0.84 | 17 | NA | NA | 10 | 5.5 | 5 | 0 | 11 | | 10 | 3.1 | 0.30 | | 0 | | |
| 2-Octanone | C ₈ H ₁₆ O | 128.2 | 12 | 240 | NA | NA | 0 | 0 | 0 | 0 | 0 | | | | | | | | |
| Reduction in uncertainty by software calculation | | | | | | | True concentration (ppm) | | | | | | 36,300 | 7,750 | 1,040 | 7,950 | 393 | | |
| | | | | | | | Measured concentration (ppm) | | | | | | 60,767 | 16,058 | 1,670 | 9,869 | 5,036 | | |
| | | | | | | | Overestimation error (%) | | | | | | 67.4% | 107.2% | 60.6% | 24.1% | 1183.0% | | |

Table C-2. Evaluation of interferent gases on measured concentration, assuming 90% software cross compensation.

| Compound Name | Formula | Molecular Weight | Maximum Previous Concentration (ppm) | Estimated Type B Concentration (ppm) | Optical Filter | Range (ppm) | Optical Filter and Detection Level (ppm) | | | | | | Contribution of Interferent Gas (Row) to Compound of Interest (Column) (ppm) | | | | |
|---|---|------------------|--------------------------------------|--------------------------------------|----------------|---------------|--|---------|---------|---------|---------|--|--|-------------------|-----------|-------|--------|
| | | | | | | | UA 0936 | UA 0971 | UA 0974 | UA 0975 | UA 0976 | | CCl ₄ | CHCl ₃ | 1,1,1-TCA | TCE | PCE |
| Carbon tetrachloride | CCl ₄ | 153.8 | 7,260 | 36,300 | UA 0936 | 6 to 100,000 | 6 | 0 | 21 | 7 | 16 | | | 16 | 156 | | 9 |
| Chloroform | CHCl ₃ | 119.4 | 1,550 | 7,750 | UA 0971 | 1 to 10,000 | 0 | 1 | 0 | 0 | 0 | | | | | | |
| 1,1,1-Trichloroethane (1,1,1-TCA) | C ₂ H ₃ Cl ₃ | 133.4 | 208 | 1,040 | UA 0974 | 0.09 to 9,000 | 0.6 | 0 | 0.09 | 1.2 | 8 | | 1,040 | | 26 | | 1 |
| Trichloroethene (TCE) | C ₂ HCl ₃ | 131.4 | 1,590 | 7,950 | UA 0975 | 0.3 to 10,000 | 0 | 0 | 4 | 0.3 | 0.07 | | | 18 | | | 454 |
| Tetrachloroethene (PCE) | C ₂ Cl ₄ | 165.8 | 78.5 | 393 | UA 0976 | 0.04 to 4,000 | 0 | 0 | 0 | 0 | 0.04 | | | | | | |
| 1,1,2-Trichlor-1,2,2-trifluoroethane | C ₂ Cl ₃ F ₃ | 187.4 | 8.2 | 164 | NA | NA | 0.07 | 0.02 | 0.05 | 0.5 | 5 | | 1,406 | 820 | 30 | 10 | 0 |
| 1,1-Dichloroethene | C ₂ H ₂ Cl ₂ | 96.94 | 0.79 | 16 | NA | NA | 0 | 0.15 | 0 | 1 | 0.21 | | | 11 | | 0 | 0 |
| 1,3,5-Trimethylbenzene | C ₉ H ₁₂ | 120.2 | 0.044 | 1 | NA | NA | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Propane | C ₃ H ₈ | 44.1 | 0.84 | 17 | NA | NA | 10 | 5.5 | 5 | 0 | 11 | | 1 | 0.3 | 0.03 | | 0 |
| 2-Octanone | C ₈ H ₁₆ O | 128.2 | 12 | 240 | NA | NA | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Reduction in uncertainty by software calculation 90% | | | | | | | True concentration (ppm) | | | | | | 36,300 | 7,750 | 1,040 | 7,950 | 393 |
| | | | | | | | Measured concentration (ppm) | | | | | | 38,747 | 8,581 | 1,103 | 8,142 | 857 |
| | | | | | | | Overestimation error (%) | | | | | | 6.7% | 10.7% | 6.1% | 2.4% | 118.3% |

Table C-3. Evaluation of interferent gases on measured concentration, assuming 95% software cross compensation.

| Compound Name | Formula | Molecular Weight | Maximum Previous Concentration (ppm) | Estimated Type B Concentration (ppm) | Optical Filter | Range (ppm) | Optical Filter and Detection Level (ppm) | | | | | | | Contribution of Interferent Gas (Row) to Compound of Interest (Column) (ppm) | | | |
|---|---|------------------|--------------------------------------|--------------------------------------|----------------|---------------|--|---------|---------|---------|---------|---------|-----|--|-------------------|-----------|-------|
| | | | | | | | UA 0936 | UA 0971 | UA 0974 | UA 0975 | UA 0976 | UA 0976 | PCE | CCl ₄ | CHCl ₃ | 1,1,1-TCA | TCE |
| Carbon tetrachloride | CCl ₄ | 153.8 | 7,260 | 36,300 | UA 0936 | 6 to 100,000 | 6 | 0 | 21 | 7 | 16 | | 5 | | 8 | 78 | |
| Chloroform | CHCl ₃ | 119.4 | 1,550 | 7,750 | UA 0971 | 1 to 10,000 | 0 | 1 | 0 | 0 | 0 | | | | | | |
| 1,1,1-Trichloroethane (1,1,1-TCA) | C ₂ H ₃ Cl ₃ | 133.4 | 208 | 1,040 | UA 0974 | 0.09 to 9,000 | 0.6 | 0 | 0.09 | 1.2 | 8 | | 0 | 520 | | 13 | 0 |
| Trichloroethene (TCE) | C ₂ HCl ₃ | 131.4 | 1,590 | 7,950 | UA 0975 | 0.3 to 10,000 | 0 | 0 | 4 | 0.3 | 0.07 | | | | 9 | | 227 |
| Tetrachloroethene (PCE) | C ₂ Cl ₄ | 165.8 | 78.5 | 393 | UA 0976 | 0.04 to 4,000 | 0 | 0 | 0 | 0 | 0.04 | | | | | | |
| 1,1,2-Trichlor-1,2,2-trifluoroethane | C ₂ Cl ₃ F ₃ | 187.4 | 8.2 | 164 | NA | NA | 0.07 | 0.02 | 0.05 | 0.5 | 5 | | | 703 | 410 | 15 | 5 |
| 1,1-Dichloroethene | C ₂ H ₂ Cl ₂ | 96.94 | 0.79 | 16 | NA | NA | 0 | 0.15 | 0 | 1 | 0.21 | | | | 5 | | 0 |
| 1,3,5-Trimethylbenzene | C ₉ H ₁₂ | 120.2 | 0.044 | 1 | NA | NA | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Propane | C ₃ H ₈ | 44.1 | 0.84 | 17 | NA | NA | 10 | 5.5 | 5 | 0 | 11 | | | 1 | 0.2 | 0.02 | 0 |
| 2-Octanone | C ₈ H ₁₆ O | 128.2 | 12 | 240 | NA | NA | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Reduction in uncertainty by software calculation 95% | | | | | | | True concentration (ppm) | | | | | | | 36,300 | 7,750 | 1,040 | 7,950 |
| | | | | | | | Measured concentration (ppm) | | | | | | | 37,523 | 8,165 | 1,071 | 8,046 |
| | | | | | | | Overestimation error (%) | | | | | | | 3.4% | 5.4% | 3.0% | 1.2% |
| | | | | | | | | | | | | | | | | | 59.1% |

